Final

Environmental Assessment Construction and Operation of Air Traffic Control Tower Project Number UHHZ063000

78th Civil Engineer Group, Environmental Management Division
Robins Air Force Base, Georgia

May 12, 2008

Report Documentation Page

Form Approved
OMB No. 0704-0188

1. REPORT DATE	2. REPORT TYPE	3. DATES COVERED
30 MAY 2008	**Final**	**-**

4. TITLE AND SUBTITLE	5a. CONTRACT NUMBER
Final Environmental Assessment Construction and Operation of Air Traffic Control Tower	5b. GRANT NUMBER
	5c. PROGRAM ELEMENT NUMBER
6. AUTHOR(S)	5d. PROJECT NUMBER
	5e. TASK NUMBER
	5f. WORK UNIT NUMBER
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) **United States Air Force 78th Civil Engineer Group Environmental Management Division Robins Air Force Base, Georgia**	8. PERFORMING ORGANIZATION REPORT NUMBER
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)	10. SPONSOR/MONITOR'S ACRONYM(S)
	11. SPONSOR/MONITOR'S REPORT NUMBER(S)

12. DISTRIBUTION/AVAILABILITY STATEMENT
Approved for public release, distribution unlimited

13. SUPPLEMENTARY NOTES

14. ABSTRACT

15. SUBJECT TERMS

16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON
a. REPORT	b. ABSTRACT	c. THIS PAGE			
unclassified	**unclassified**	**unclassified**	**SAR**	**107**	

Standard Form 298 (Rev. 8-98)
Prescribed by ANSI Std Z39-18

FINDING OF NO SIGNIFICANT IMPACT
CONSTRUCTION AND OPERATION OF
AIR TRAFFIC CONTROL TOWER

Background and Purpose - 78th Civil Engineer Group, Environmental Management Division (78 CEG/CEV) has conducted an Environmental Assessment (EA) to address the potential effects of construction and operation of a new Air Traffic Control Tower (ATCT) at Robins Air Force Base (AFB). The proposed new ATCT would modernize 78th Operations Support Squadron (78th OSS) air traffic control operations and equipment; provide additional space for required air traffic control personnel, equipment and functions; and generally provide a more optimal work environment for air traffic control personnel. The existing Control Tower building would no longer be needed.

The existing Control Tower (Building 37) was designed and built in 1972 to accommodate air traffic control operations only (it provides limited space for equipment). The structural, mechanical, and electrical components of the Control Tower have declined to the point that these building systems need frequent attention and repairs. By current functional standards, the building cannot be renovated to incorporate all current air traffic control operations functions, nor is it cost effective or practical to renovate the existing Control Tower cab in order to comply with current Life and Fire Safety standards and seismic requirements. Personnel access to the Control Tower cab is also limited because no elevator serves the facility.

Current 78th OSS operations tempo has remained relatively constant; however, the required number of personnel working in the existing Control Tower cab, along with equipment additions and upgrades, will eventually crowd the cab and render the tower inefficient for day-to-day operations. In addition, the Control Tower, as currently sited, is in the center of several aircraft engine test facilities and is adversely affected by noise pollution. The current location also requires air traffic control-related vehicles to travel on the airfield, a situation which is preferably avoided.

Two alternatives were considered in the EA: the Proposed Action and the No-Action Alternative. Other alternatives initially considered failed to meet criteria for the project and were not evaluated in the EA. These failed alternatives included the placement of the new ATCT in one of three alternate locations at Robins AFB. However, because these alternate locations did not meet the requirements of a location that is not exposed to excessive noise pollution from surrounding facilities; that provides easy access for squadron personnel; that places the air traffic pattern in front of the controller (in a standard configuration) and that provides access to existing utilities for construction/development, these alternatives were therefore eliminated from further evaluation.

Description of the Proposed Action - The Proposed Action consists of construction of the new ATCT and transfer of air traffic operations currently conducted by 26 78th OSS personnel in the existing Control Tower. The existing Control Tower building would be demolished subsequent to the construction and operation of the proposed ATCT.

The proposed site for the new ATCT is located near the northeastern corner of Mustang Street and Eagle Avenue, immediately west of the Georgia Air National Guard (ANG) Apron, within

the northern portion of Robins AFB. The Proposed Action Site is located approximately 3,350 feet north-northwest of the existing Control Tower. The Proposed Action site currently consists of a vacant, mowed grassy lot. The site is bounded by an ANG building and roadways, and the area containing the site is surrounded by chain-link fencing.

The new ATCT would consist of an approximately 8,300-square-foot, 10-story structure. Construction would include reinforced concrete footings and foundation, utilities, fire protection systems, elevator, landscaping, back-up power, air traffic control simulator space, front-load training area, and communications support. The height of the control tower cab floor would be 99 feet AGL (104 feet AGL eye level). This height is necessary to provide adequate visibility for taxiways/runways, provide the minimum angle of 35 degrees for depth perception to the farthest aircraft traffic surface (toward the south) on the airfield, and the new ATCT's expansive square footage is crucial for providing necessary equipment, training, briefing and administrative space. The existing Control Tower is located on the western side of the airfield at the intersection of Taxiways B, G and H, and consists of an eight-story structure only 4,750 square feet in size. An associated emergency generator facility and Control Tower simulator building/pre-fabricated shelter are located adjacent to the main building; these associated facilities would be relocated and reused elsewhere on base.

Description of the No-Action Alternative - Under the No-Action Alternative, the new ATCT would not be constructed and 78th OSS air traffic control operations would continue in the existing Control Tower. Failure to address the Control Tower space limitations and facility deficiencies would perpetuate the less than optimal air traffic control working conditions and operations at Robins AFB. Crowded cab conditions would remain a problem that limits air traffic controller mobility, prevents functional and efficient operational procedures, and results in less than optimal controller communications.

Environmental Effects - The EA describes current environment conditions at Robins AFB and potential environmental effects of conducting the No-Action Alternative and Proposed Action. Implementation of the No-Action Alternative would not result in significant adverse impacts or significant beneficial impacts to the environment and socioeconomy. Implementation of the Proposed Action would result in no or minimal impacts on the following resources and elements: topography, surface waters, floodplains, wetlands, geology, soils, groundwater, water supply, drinking water, wastewater, biological environment, and cultural resources. Implementation of the Proposed Action would also result in insignificant adverse impacts or beneficial impacts to the remaining resources and elements, specifically storm water, solid waste, toxic materials, safety and socioeconomy.

Construction contractors would not cause significant adverse impacts to surface waters because the base uses Best Management Practices (BMPs) during the course of day-to-day operations. The contractors would use BMPs such as silt fencing, hay bales and erosion blankets during the construction of the ATCT to control storm water runoff or land disturbance so as not to cause significant adverse impacts. The contractor would obtain all appropriate permits, and dispose of waste appropriately under governing regulations, thus causing only temporary and insignificant effects to air quality, waste management, noise and traffic. Identified asbestos-containing material, lead-based paint and polychlorinated biphenyl-containing waste generated from the demolition of the existing tower would be removed and disposed of in accordance with applicable regulations. The Proposed Action would produce a positive effect on the

socioeconomy, as construction expenditures represented by the proposed facility would provide a short-term economic stimulus to the region's economy. The Proposed Action would also produce a long-term positive effect on worker safety, as air traffic control operations would benefit from increased work space, modern equipment, and an environment protected from external noise pollution.

Cumulative impacts to the environment resulting from additional projects that are proposed, ongoing, recently completed, or anticipated to be implemented in the near future also received evaluation. The most notable cumulative impact resulting from the construction of new facilities in the area of the Proposed Action would be cumulative increases in storm water runoff due to increased impermeable surface area; however, when considered in conjunction with the implementation of low impact development (LID) design techniques, these cumulative increases in storm water runoff would not cause significant negative effects to surface waters. In addition, Robins AFB's day-to-day operations and plans to use BMPs would control land disturbance and storm water runoff. Finally, the cumulative effects of the Proposed Action, when added to other past, present, and reasonably foreseeable future actions, were also evaluated and found to be insignificant, because the remaining resources and elements would not be significantly affected under the Proposed Action, and the impacts when added to other past, present, and reasonably foreseeable future actions would not be significant.

A notice was published on 19 January 2008 in the *Houston Home Journal* inviting the public to review and comment upon the Draft Final EA; no comments were received within the 30-day review period. A request was also submitted to the Georgia State Clearinghouse on 11 March 2008 requesting review by various state agencies with a review period of 30 days. Responses were received from the Middle Georgia Regional Development Center, Georgia Department of Transportation – Aviation Programs, Georgia Natural Resources (DNR) Historic Preservation Division and the Georgia DNR Environmental Protection Division Director's Office and are addressed in the Final EA; all agency consultation is complete.

Conclusion

Detailed evaluation was conducted to determine potential adverse effects to the human, physical and natural environment, as presented in the *Environmental Assessment, Construction and Operation of Air Traffic Control Tower*, 2008. Based upon my review of the facts and analyses contained in the attached EA, which is hereby incorporated by reference, I conclude that the Proposed Action will not have a significant environmental impact. An Environmental Impact Statement is not required for this action. This document, and the supporting EA, fulfills the requirements of National Environmental Policy Act, the Council on Environmental Quality regulations, and Title 32, Code of Federal Regulations, Part 989, Environmental Impact Analysis Process.

Approved:

Robert H Farrell

ROBERT FARRELL
Deputy Base Civil Engineer
78th Civil Engineer Group

30 MAY 2008
Date

This page intentionally left blank.

Final

Environmental Assessment
Construction and Operation
of
Air Traffic Control Tower
Project Number UHHZ063000

for

78th Civil Engineer Group, Environmental Management Division
Warner Robins Air Logistics Center
Robins Air Force Base, Georgia
Contract No. FA4890-04-D-0005, Delivery Order No. Q601

May 12, 2008

Prepared by

URS Group, Inc.
1000 Abernathy Road NE, Suite 900
Atlanta, Georgia 30328-5648

Kenneth Branton
Delivery Order Manager

This page intentionally left blank.

EXECUTIVE SUMMARY

Robins Air Force Base (AFB) proposes to construct a new Air Traffic Control Tower (ATCT) to replace the existing outdated ATCT (referred to herein as "Control Tower" to differentiate between the existing and proposed facilities, respectively). The proposed ATCT (Project Number UHHZ063000, Building # 2317) would modernize air traffic control operations and equipment; provide additional space for required air traffic control personnel, equipment and functions; and generally provide a more optimal work environment for air traffic control personnel.

78th Operations Support Squadron (78th OSS) is responsible for runway and airfield operations management for all assigned and transient aircraft. 78th OSS provides 24-hour base operations, air traffic control, weather support, flight records, and transient aircraft services. Twenty-six 78th OSS personnel work at the existing Control Tower, which operates 24 hours per day seven days a week and controls air traffic for 34,000 to 40,000 aircraft operations annually.

The existing Control Tower (Building 37) was designed and built in 1972 to accommodate air traffic control operations only (it provides limited space for equipment). The structural, mechanical, and electrical components of the Control Tower have declined to the point that these building systems need frequent attention and repairs. By current functional standards, the building cannot be renovated to incorporate all current air traffic control operations functions, nor is it cost effective or practical to renovate the existing Control Tower cab in order to comply with current Life and Fire Safety standards and seismic requirements. Personnel access to the Control Tower cab is also limited because no elevator serves the facility; a conventional steel staircase serves as the main access from the first to the seventh floor of the Control Tower, with a steep "ships ladder" providing access to the tower cab from the seventh floor. A small, half-height door serves as access to the narrow tower catwalk. No alternate means of egress exist in the event of a fire.

Current 78th OSS operations tempo has remained relatively constant; however, the required number of personnel working in the Control Tower cab, along with equipment additions and upgrades, will eventually crowd the cab and render the space inefficient for day-to-day operations. Furthermore, little to no space exists to carry out the administration, training and management functions associated within the tower operations area. Current training operations occur in areas with less than adequate space and hinder air traffic control operations. In addition, the Control Tower, as currently sited, is in the center of several aircraft engine test facilities and is adversely affected by noise pollution. The current location of the Control Tower in the airfield / industrial area also requires air traffic control-related vehicles to travel on the airfield, a situation which is preferably avoided.

78th Civil Engineer Group, Environmental Management Division (78th CEG/CEV) has conducted this EA to identify and assess potential effects of the Proposed Action: construction and operation of a new ATCT at Robins AFB and demolition of the existing Control Tower facility.

The proposed site for the new ATCT is located near the northeastern corner of Mustang Street and Eagle Avenue, immediately west of the Georgia Air National Guard (ANG) Apron, within the northern portion of Robins AFB. The Proposed Action Site is located approximately 3,350 feet north-northwest of the existing Control Tower. The Proposed Action site currently consists of a vacant, mowed grassy lot. The site is bounded by an ANG building and roadways, and the area containing the site is surrounded by chain-link fencing.

The existing Control Tower (Building 37) Site is located on the western side of the airfield at the intersection of Taxiways B, G and H. The Control Tower consists of an eight-story structure (seven floors and a tower cab) approximately 4,750 square feet in size. The tower cab is supported on a steel-reinforced open member structure covered by concrete, cinder block, and stucco veneer. The height of the tower cab floor is approximately 70 feet above ground level (AGL). In addition, the tower has an emergency generator facility just adjacent to the main building, and a Control Tower

simulator building/pre-fabricated shelter was recently built adjacent to the tower to house the new Adacel Control Tower Simulator System.

Air traffic control operations currently conducted by the 78th OSS, including personnel and needed equipment, would be relocated to the new ATCT. The new ATCT would consist of an approximately 8,300-square-foot, 10-story building constructed with reinforced concrete footings and foundation. Additional features include utilities, fire protection systems, elevator, landscaping, back-up power, air traffic control simulator space, front-load training area, and communications support. The planned operations would be consistent with the existing 78th OSS functions. The existing Control Tower would be demolished after relocation of 78th OSS air traffic control operations.

No other action alternative was identified that met all the requirements of the project, and thus none is evaluated in the EA. Other alternatives initially considered failed to meet criteria for the project and were not evaluated in the EA. These failed alternatives included the placement of the new ATCT in one of three alternate locations at Robins AFB. However, because these alternate locations did not meet the requirements of a location that is not exposed to excessive noise pollution from surrounding facilities; that provides easy access for squadron personnel; that places the air traffic pattern in front of the controller (in a standard configuration) and that provides access to existing utilities for construction/development these alternatives were therefore eliminated from further evaluation.

The No-Action Alternative evaluated herein involves no project implementation - the new ATCT would not be constructed and 78th OSS air traffic control operations would continue in the existing Control Tower. Failure to address the Control Tower space limitations and facility deficiencies would result in less than optimal air traffic control working conditions and operations at Robins AFB. Crowded cab conditions would remain a problem that limits air traffic controller mobility, prevents functional and efficient operational procedures, and results in less than optimal controller communications.

Neither the Proposed Action nor the No-Action Alternative was determined to cause significant adverse short-term or long-term impacts to the environment (**Table 2-1).** Constructing and operating the ATCT at the Proposed Action Site would provide positive socioeconomic impacts and positive safety impacts for air traffic control personnel.

Cumulative impacts to the environment resulting from additional projects that are proposed, ongoing, recently completed, or anticipated to be implemented in the near future also received evaluation. The most notable cumulative impact resulting from the construction of new facilities in the area of the Proposed Action would be cumulative increases in storm water runoff due to increased impermeable surface area; however, when considered in conjunction with the implementation of low impact development (LID) design techniques, these cumulative increases in storm water runoff would not cause significant negative effects to surface waters. In addition, Robins AFB's day-to-day operations, and plans to use Best Management Practices (BMPs) would control land disturbance and storm water runoff. Cumulative impacts from the remaining environmental resources and elements were also assessed and were determined to be insignificant because the resources and elements would not be significantly affected under the Proposed Action, and the impacts when added to other past, present, and reasonably foreseeable future actions would not be significant (**Table 2-1**).

CONTENTS

TABLES

FIGURES

APPENDICES

This page intentionally left blank.

ABBREVIATIONS & ACRONYMS

78th CEG/CEV	78th Civil Engineer Group, Environmental Management Division
78th OSS	78th Operational Support Squadron
202nd EIS	202nd Engineering Installation Squadron
ACM	asbestos-containing material
AFB	Air Force Base
AFOSH	Air Force Occupational Safety and Health
AGL	above ground level
ANG	Air National Guard
AST	aboveground storage tank
ATCT	Air Traffic Control Tower
bgs	below ground surface
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DoD	Department of Defense
DRMO	Defense Reutilization and Marketing Office
EA	Environmental Assessment
EPD	Environmental Protection Division
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
HVAC	Heating, Ventilation, & Air Conditioning
HWMP	Hazardous Waste Management Plan
HWRP	Hazardous Waste Reduction Plan
ICRMP	Integrated Cultural Resources Management Plan
ISWMP	Integrated Solid Waste Management Plan
IWTP	Industrial Wastewater Treatment Plant
kVA	kilovolt-ampere
LBP	lead-based paint
msl	mean sea level
NAAQS	National Ambient Air Quality Standards
NAVAID	navigational aid
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
POV	privately owned vehicle
UFC	United Facilities Criteria
USDA	United States Department of Agriculture

This page intentionally left blank.

1.0 PURPOSE AND NEED FOR PROPOSED ACTION

78th Civil Engineer Group, Environmental Management Division (78th CEG/CEV), has conducted this Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) to identify and assess potential effects of the Proposed Action and the No-Action Alternatives as described in **Section 2** and evaluated in **Sections 3 and 4**. The Proposed Action includes the construction and operation of a new Air Traffic Control Tower (ATCT), (Project Number UHHZ063000, Building # 2317), to enhance the existing air traffic control operations at Robins Air Force Base (AFB). The existing Control Tower will be demolished as a part of the Proposed Action. The purpose and need for this action are described in the following sections.

1.1 PURPOSE OF PROPOSED ACTION

78th Operations Support Squadron (78th OSS) is responsible for runway and airfield operations management for all assigned and transient aircraft. They provide 24-hour base operations, air traffic control, weather support, flight records, and transient aircraft services. The tower provides air traffic control for 34,000 - 40,000 aircraft operations annually.

The purpose of the Proposed Action is to provide a new ATCT that would update and relocate the existing air traffic control operations that are currently conducted at the existing ATCT (referred to herein as "Control Tower" to differentiate between the existing and proposed facilities). The ATCT would incorporate new technology and increase the interior work space to address the outdated technology and current cramped conditions in the existing Control Tower. The construction and operation of a new ATCT would provide for the placement of the facility at an optimal airfield vantage point and facilitate ease of access for tower personnel. In addition, the new ATCT location would reduce the number of 78th OSS personnel vehicles (and support personnel) operating on the restricted airfield/industrial area and remove the air traffic control operation away from the noisy aircraft functional testing areas. The proposed ATCT site would also provide the required space to construct a collocated facility in which to accommodate the

squadron's personnel, maintaining unit cohesiveness, as the personnel are currently scattered among multiple buildings.

With the construction of the proposed ATCT and transfer of air traffic control operations, the existing Control Tower would serve no useful function. No operations at Robins AFB would make use of the Control Tower building, so demolition of the existing Control Tower would be addressed as a part of the Proposed Action.

1.2 NEED FOR PROPOSED ACTION

The existing Control Tower (also known as Building 37) was designed and built in 1972 to accommodate air traffic control operations only and provided limited equipment space. The facility has subsequently been remodeled, but very few enhancements to the building have been accomplished. The structural, mechanical, and electrical components of the Control Tower facility have declined to the point that repairs are required with greater frequency. Robins AFB Civil Engineering has adequately kept pace with the repairs and renovations, but costs and expenditures are increasing with time. Current 78th OSS operations tempo has remained relatively constant; however, the required number of personnel working in the tower cab, along with equipment additions and upgrades, will eventually crowd the cab and render the space inefficient for day-to-day operations. In addition, the Control Tower, as currently sited, is in the center of several aircraft engine test facilities and is adversely affected by noise pollution. The current location of the Control Tower in the restricted airfield / industrial area also requires air traffic control-related vehicles to travel on the airfield, a situation which is preferably avoided.

The existing Control Tower building consists of seven floors and a cab. The height of the tower cab floor is approximately 70 feet above ground level (AGL) and provides fair visual surveillance and depth perception of the aerodrome (airfield and associated hangars/buildings). No elevator serves this facility. Instead, a conventional steel staircase serves as the main access from the first to the seventh floor with a steep "ships ladder" for access to the tower cab from the seventh floor. A small, half-height door serves as access to the narrow tower catwalk. In the event of a fire, a Baker Life Chute device

(tubular netting used for rapid evacuee descent) would serve as the only means of emergency egress.

Little to no space exists to carry out the administration, training and management functions associated within the tower operations area. Presently, training is accomplished concurrently with day-to-day operations in the tower cab and "front-load" training is accomplished at the base of the tower, and in an adjacent Control Tower simulator shelter/building. Front-load training provides air traffic control trainees with base-specific information about the airfield such as the layout and length of the runways. Current training operations are conducted in areas with less than adequate space and hinder air traffic control operations.

By current functional standards, the building cannot be renovated to incorporate all current air traffic control operations functions. It is neither cost effective nor practical to renovate the existing Control Tower cab in order to comply with current Life and Fire Safety standards and seismic requirements. Additionally, the current heating, ventilation and air conditioning (HVAC) system needs frequent attention and repairs are often required.

In conclusion, a new ATCT is needed at Robins AFB to alleviate the overcrowded working conditions at the existing Control Tower; to address the outdated air traffic control technology and declining conditions of the building systems; and to provide a siting location that is not adversely affected by excessive noise pollution from surrounding operations.

This page intentionally left blank.

2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

This chapter presents the considerations used for selecting alternatives, describes the Proposed Action and No-Action Alternative and summarizes the environmental consequences of implementing the Proposed Action and No-Action Alternative. Other potential alternatives that were preliminarily evaluated and subsequently eliminated from further consideration are also discussed briefly in the following sections.

2.1 REQUIREMENTS

Several requirements were identified for the evaluation of alternatives for fulfilling the purpose of a facility to be configured for air traffic control operations. Alternatives that merit detailed evaluation must meet the following criteria that support the purpose and need for action.

- Compliance with United States Department of Defense (DoD) minimum force protection construction standards as outlined in *DoD Minimum Antiterrorism Standards for Buildings* (DoD, 2003):
    - a building greater than 150 feet from the controlled perimeter, and
    - a site large enough for a 33-foot standoff distance from the structure.
- Ability to provide an approximately 8,300-square-foot ATCT that can provide space for air traffic control operations including: air traffic control simulator space, front-load training area, back-up power, communications support, elevator and landscaping.
- Ability to provide a modern and operational ATCT facility by February 2014 (Fiscal Year [FY] 2014) without interrupting current mission requirements to provide air traffic control functions for Robins AFB.
- Ability to provide an ATCT that includes the following characteristics:
    - meets Airfield Siting Criteria under the guidance set forth in the United Facilities Criteria (UFC) 3-260-01 (specifically, control towers are permissible deviations to criteria as long as the tower is not a controlling obstacle for a missed approach);
    - site location that provides adequate visibility and depth perception of all airfield surfaces, preferably west of the airfield for best visibility;
    - site location that does not include excessive noise pollution from surrounding facilities such as industrial buildings and engine test facilities;

- site location that provides easy access for squadron personnel;
- site location that places the air traffic pattern in front of the controller, in a standard configuration;
- site location that provides access to existing utilities for construction/development; and
- a facility that includes adequate HVAC, utilities, fire protection, lightning protection, and necessary utility support for operation.

2.2 PROPOSED ACTION LOCATION AND DESCRIPTION

This EA addresses the proposed construction and operation of a new ATCT at Robins AFB. Robins AFB is located in Houston County in central Georgia, approximately 100 miles southeast of Atlanta, 18 miles south of Macon, and immediately east of the city of Warner Robins (**Figures 1 and 2**).

Components of the Proposed Action include:

- Construction of a new ATCT sufficient for serving air traffic control operations at Robins AFB.
  - Construction of the new facility would begin in FY 2013 and be completed in FY 2014.
  - The site selected for the new ATCT, referred to herein as "Proposed Action Site" is an approximately 1-acre lot located near the northeastern corner of Mustang Street and Eagle Avenue, immediately west of the Georgia Air National Guard (ANG) Apron, within the northern portion of Robins AFB (**Figures 3 and 4**) on the Georgia ANG-controlled property.

    The Proposed Action Site currently consists of a vacant, mowed grassy lot **(Figure 4)**.
  - Construction of an approximately 8,300-square-foot, 10-story ATCT. Construction includes reinforced concrete footings and foundation, utilities, fire protection systems, elevator, landscaping, back-up power, air traffic control simulator space, front-load training area, and communications support.
- Specific construction design components for a new ATCT on the Proposed Action Site at Robins AFB include the following.
  - The height of the control tower cab floor would be 99 feet AGL (104 feet AGL eye level) (eight floors at 10.5 feet and one mechanical floor at 15 feet plus a tower cab floor). This added height and square footage is

necessary to provide adequate visibility for taxiways/runways, provide the minimum angle of 35 degrees for depth perception to the farthest aircraft traffic surface (toward the south) on the airfield, and provide necessary equipment, training, briefing and administrative space. The floor designations would be as follows:

First Floor:	Telephone Distribution, Mechanical Room
Second Floor:	Chief Controller Office
Third Floor:	Administrative space
Fourth Floor:	Control Tower Simulator
Fifth Floor:	Briefing Room
Sixth Floor:	Lower Electronics Equipment Room
Seventh Floor:	Upper Electronics Equipment Room
Eighth Floor	Break/Ready Room
Ninth Floor	Transfer level (including mechanical rooms)
Top Floor:	Tower Cab

Note: With the exception of the Tower Cab, Mechanical Room and Equipment Rooms, the other floor designations may be moved up or down to meet operational needs. Equipment specifications require the two Electronics Equipment Rooms to be located as close to the tower cab as possible and to allow the Transfer level (HVAC and elevator controls) and Break/Ready Room to be located below the cab. Also, the size of the control tower shaft would be increased to accommodate the integration of the Tower Simulator System.

- Utilities: Electrical power would be 120/208, 60 Hz, plus or minus 10 percent, three-phase, four wire. A 120-140 kilovolt-ampere (kVA) back-up generator with automatic transfer switch and uninterruptible power supply for all technical power requirements is required. An equipotential grounding system would be installed in the tower cab and the two equipment rooms and tied to an approved earth electrode sub-system in accordance with Military Standard 188-124B. Consideration would be given to provide for a single generator to supply back-up power for the proposed ATCT and airfield lighting vault. An associated diesel fuel aboveground storage tank (AST) would be installed outdoors to hold fuel for the emergency generator.
- Environmental: Environmental controls would be included in the control cab, simulator room, and two electronic equipment rooms in order to sustain effective and continuous electronic equipment operation.
- Airfield Lighting Control Panel: An airfield lighting control panel, connected to the airfield lighting vault, would be required for the new

ATCT. The panel would be required to be in accordance with Federal Aviation Administration Advisory Circular No. 150/5345-3D, Specifications for L821 panels for remote control of airport lighting, 8 Aug 1986.

- Communications: All existing communication lines/circuitry for NAVAID (navigational aid) monitors and radio transmitters/receivers terminating in the existing Control Tower would be provided to the new ATCT. The Communications Squadron would coordinate with the Systems Telecommunications Engineering Manager and Engineering and Installation project engineer regarding the relocation requirements.
- Underground Duct: The existing base duct system would be relocated in the area of the new ATCT site for field lighting cables, primary power cables, control cables, telephone cables, and meteorological cables. Existing cables within the construction zone would be field verified and relocated subsequent to ground breaking for the ATCT.
- Existing utilities surrounding the Proposed Action Site would be removed and relocated, as needed.
- The majority of the new site would be paved with concrete or occupied by the new ATCT **(Figure 5).**

- The existing Control Tower (Building 37) would continue to operate during construction of the new ATCT;
- Relocation of 78th OSS operations and personnel currently located in the existing Control Tower (Building 37) to the new ATCT facility (no additional personnel would be hired to support air traffic control operations);
- Demolition of existing Control Tower (Building 37)
  - Removal and proper disposal of construction debris, toxic and non-toxic materials located within the structure.
  - Removal and proper disposal of contaminated soil (if any) encountered during the removal of building footings and other subsurface features.

The Proposed Action does not include changes to existing 78th OSS operations at Robins AFB other than a new ATCT in a new location. Materiel from existing 78th OSS operations located in Building 37 would be transferred to the new ATCT, as needed.

All of the Proposed Action requirements listed in **Section 2.1** would be incorporated into the new facility on the Proposed Action Site.

2.3 NO-ACTION ALTERNATIVE

Under the No-Action Alternative, no construction would occur at Robins AFB related to the new ATCT. All 78th OSS operations at Robins AFB would continue as they do at present in the existing Control Tower. Failure to address the Control Tower space limitations and facility deficiencies would result in less than optimal air traffic control working conditions and operations at Robins AFB. Crowded cab conditions would remain a problem that limits air traffic controller mobility, prevents functional and efficient operational procedures, and results in less than optimal controller communications.

2.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER CONSIDERATION

The alternatives evaluation included preliminary assessments of the existing Control Tower (Building 37) and alternative sites for new ATCT construction and operation. No other existing buildings were identified at Robins AFB that would meet the project requirements, so none were evaluated in this EA. Three site locations where a new ATCT could be constructed were identified and were initially considered as part of the alternatives evaluation.

Alternate Site 1 was identified as the existing Control Tower (Building 37) located on the western side of the airfield at the intersection of Taxiways B, G and H. A new ATCT on this location would provide adequate visibility of all airfield surfaces. However, the major disadvantage in selecting the existing Control Tower site is the encroachment by industrial buildings and several engine test facilities rendering the site unacceptable due to excessive noise pollution. The existing Control Tower site does not meet the requirement of a location not exposed to excessive noise pollution from surrounding facilities. Additionally, if the current Control Tower location were chosen, it would require utilizing a mobile tower as an interim facility. The use of a mobile tower asset would significantly impact wing flying operations due to the limited space and equipment that could be contained therein, and limit airfield visibility. Alternative Site 1 did not

meet the Proposed Action requirements as described above, and was therefore eliminated from further evaluation.

Alternate Site 2 was identified as being in the general area of existing Building 110, approximately 3,000 feet west of the Runway 15/33 centerline and approximately 3,000 feet north of the Runway 33 Threshold. An ATCT at this location would provide adequate visibility of all airfield surfaces; however, the major disadvantage in selecting this location is that the ATCT would be in the center of the Warner Robins Depot industrial repair area. Access to the area would be through the industrial area. Alternate accessibility to this alternative site would require all occupants of the ATCT to be certified flightline drivers, as one must cross several active parking ramps to gain access. This alternative site does not meet the requirement of a location that provides easy access for squadron personnel. Alternative Site 2 did not meet the Proposed Action requirements as described above, and was therefore eliminated from further evaluation.

Alternate Site 3 was identified as the general area east of Runway 15/33, 1,700 feet east of the Runway 15/33 centerline and approximately 5,000 feet north of the Runway 33 Threshold. An ATCT at this location would provide adequate visibility of all airfield surfaces; however, the major disadvantage in selecting this location is distance and location from the main base. The site would require additional work to bring water, sewer, and communications infrastructure to this area, as it is also in a "wetlands" designated area. Siting the control tower in this location would place the aircraft traffic pattern behind the controller, in a non-standard configuration, causing a potential safety of flight issue making this an undesirable site. Changing the aircraft pattern, to place the aircraft in front of the controllers, would be difficult due to Atlanta Center airspace requirements. This alternative site does not meet the requirements of a location that provides easy access for squadron personnel; that places the air traffic pattern in front of the controller (in a standard configuration) and that provides access to existing utilities for construction/development. Alternative Site 3 did not meet the Proposed Action requirements as described above, and was therefore eliminated from further evaluation.

Alternative Sites 1, 2, and 3 are not discussed further in this EA. The site identified herein as the Proposed Action Site was the only alternative site evaluated that met all the requirements for the project, and thus is further assessed in this EA.

The Proposed Action Site provides the greatest visibility for air traffic control operations, and accessibility issues. Under current conditions, in order to meet siting criteria requirements, the best visibility to the airfield surface can generally be found by finding an acceptable site west of Runway 15/33. Although a site in proximity to midfield is preferred, encroachment by the Depot industrial areas has rendered many areas unacceptable for a control tower site.

2.5 COMPARISON OF POTENTIAL EFFECTS

Table 2-1 presents a summary comparison of alternatives receiving detailed evaluation in this EA, which are the Proposed Action (construction of a new ATCT [including the demolition of the existing Control Tower/Building 37] and 78th OSS operations at the Proposed Action Site) and the No-Action Alternative. Implementation of the Proposed Action or the No-Action Alternative, as detailed in **Section 4** of this document, would result in no significant adverse effect.

Table 2-1. Comparison of Alternatives Receiving Detailed Evaluation

Phase of Action (C = Construction; O = Operation)		**Proposed Action - Proposed Air Traffic Control Tower**		**No-Action Alternative**
		C	**O**	**N/A**
Environmental Component		+ = Beneficial Effect, --- = Insignificant Adverse Effect, O = No Effect		
Physical Environment	Topography	O	O	O
	Surface Waters	O	O	O
	Floodplains and Wetlands	O	O	O
	Storm Water	---	O	O
	Geology and Soils	O	O	O
	Groundwater	O	O	O
	Water Supply and Drinking Water	O	O	O
Air Quality		---	O	O
Waste Management and Toxic Materials	Wastewater	O	O	O
	Solid Waste	---	O	O
	Hazardous Materials and Waste	---	O	O
	Toxic Materials	---	O	O
Noise Environment		---	O	---
Biological Environment		O	O	O
Cultural Resources		O	O	O
Socioeconomic Environment		+	O	O
Safety		O	+	---
Transportation		---	O	O
Cumulative Impacts		---	---	---

3.0 AFFECTED ENVIRONMENT

This section describes the existing environment within the area potentially affected by the Proposed Action and No-Action Alternative. Brief descriptions of the Proposed Action Site and the Existing Control Tower Site are followed by descriptions of the physical environment, air quality, waste management and toxic materials, noise environment, biological environment, cultural resources, socioeconomic environment, and transportation and safety. Discussion of the described elements and resources provides the basis for analysis of potential effects to the environment from the Proposed Action and No-Action Alternative.

Relevant background on Robins AFB is presented in **Appendix A**. Site-specific information presented in this section is derived from on-site evaluation and information obtained from 78th CEG/CEV, 78th OSS and other Robins AFB personnel.

Proposed Action Site - The Proposed Action Site is an approximately 1-acre lot located near the northeastern corner of Mustang Street and Eagle Avenue, immediately west of the Georgia ANG Apron, within the northern portion of Robins AFB (see **Figure 2**). The site currently consists of a vacant, mowed grassy lot. The site is bounded by an ANG building and roadways, and the area containing the site is surrounded by chain-link fencing.

The Proposed Action Site is located approximately 3,350 feet north-northwest of the existing Control Tower, approximately 2,200 feet from the centerline of Runway 15/33, and 3,500 feet south of the Runway 15 Threshold. The site is bound on the north by Building 2336 of the ANG; on the east by Centurion Boulevard, beyond which is the ANG Apron; on the south by Mustang Street, beyond which is mowed field; and on the west by Eagle Avenue, beyond which are ANG personnel parking lots and Mustang Street (see **Figures 3 and 4**).

The site has not been previously developed with structures. However, debris generated during initial construction of the airfield has been buried or disposed in the general area

of the Proposed Action Site, and buried construction debris required excavation and removal during construction of the Fire and Crash Rescue Facility (located approximately 1,800 feet to the south). The debris materials from the airfield construction would have consisted of construction debris (concrete, metal and wood) and other inert materials. No environmental concerns are known to exist in association with these materials. The area of the Proposed Action Site is not currently used for disposal purposes.

Underground potable water system lines, storm water sewer lines, sanitary wastewater collection system lines, industrial wastewater lines, and electrical lines are located at the periphery of the site, primarily along Eagle Avenue, Mustang Street and Centurion Boulevard.

Existing Control Tower (Building 37) Site - The existing Control Tower (Building 37) Site is located on the western side of the airfield at the intersection of Taxiways B, G and H (see **Figures 2 and 3**). The site is bound on the north by mowed lawn, beyond which is Taxiway H; on the east by mowed lawn, beyond which is the intersection of Taxiways B, G and H; on the south by mowed lawn, beyond which is Taxiway B; and on the west by a paved access road, beyond which are Building 36 and additional industrial/maintenance buildings.

The existing Control Tower consists of an eight-story structure (seven floors and a tower cab) approximately 4,750 square feet in size. It was designed and built in 1972. The tower cab is supported on a steel-reinforced open member structure covered by concrete, cinder block, and stucco veneer. The height of the tower cab floor is approximately 70 feet AGL. The cab houses the majority of the air traffic control equipment and personnel. A small equipment room with back-up radios and restroom is located directly below the cab on the seventh floor. The equipment room with Enhanced Terminal Voice Switch and Digital Voice Recorder System are located on the sixth floor. HVAC air handlers are located on the fifth floor. The Break Room is located on the fourth floor and the Airfield Operations Flight Office is below on the third floor. The Chief Controller's Office is on the second floor and the first floor is used for storage. The first floor also has an administrative area addition for training, a conference room, men's and women's

restrooms and additional storage space. No elevator serves this facility. A conventional steel staircase serves as the main access from the first to the seventh floor with a steep "ships ladder" for access to the tower cab from the seventh floor. A small, half-height, door serves as access to the narrow tower catwalk.

In addition, the tower has a generator facility just adjacent to the main building. It is a 550 kilowatt (KW) generator and supplies emergency power to the tower and airfield lighting vault. A 3,000 gallon Convault® aboveground storage tank (AST) is located adjacent to the emergency generator unit. The AST contains Diesel Fuel No. 2 and was installed in 2004. Aboveground lines run from the AST to the generator unit. No problems have been reported for these systems, and no obvious indications of leaks or releases were reported at the site at the time of the May 2007 site visit performed in support of this EA. A Control Tower simulator building/pre-fabricated shelter was recently built adjacent to the tower to house the new Adacel Control Tower Simulator System. Underground utilities including potable water lines, the sanitary wastewater collection system lines and electrical lines are located at the periphery of this site.

Twenty-six 78th OSS personnel are located at the existing Control Tower. The tower operates 24 hours per day seven days a week. 78th OSS personnel park vehicles in the parking lot in front of the Control Tower.

3.1 PHYSICAL ENVIRONMENT

The following description of the physical environment of the study areas is based on its principal components: topography, surface waters, floodplains, wetlands, storm water, geology and soils, groundwater and water supply and drinking water.

3.1.1 Topography

Topography at the Proposed Action Site and Existing Control Tower (Building 37) Site is relatively flat, with an average elevation of approximately 310 feet above mean sea level (msl) and 275 feet msl, respectively.

3.1.2 Surface Waters

No natural surface water bodies are located on or adjacent to the Proposed Action Site or the Existing Control Tower (Building 37) Site, and no current operations at, or characteristics of, the sites adversely impact surface waters. The nearest natural surface waters are an unnamed, intermittent tributary located approximately 2,000 feet south-southwest of the Proposed Action Site and an unnamed, intermittent tributary located approximately 1,000 feet west of the Existing Control Tower (Building 37) Site.

3.1.3 Floodplains and Wetlands

Based on review of flood insurance rate maps of the Federal Emergency Management Agency (FEMA, 1996), the most recent floodplain map (Robins AFB, 2006), and site observations, the Proposed Action Site and Existing Control Tower (Building 37) Site are not located within the 100-year floodplain, nor do the sites contain jurisdictional wetlands. No activities or operations at the sites directly impact floodplains and wetlands.

3.1.4 Storm Water

The Proposed Action Site and the Existing Control Tower (Building 37) Site do not currently receive storm water runoff from off-site sources. Precipitation falling onto the sites infiltrates the site soils or sheet flows into storm water ditches and drains located adjacent to the sites. The ditches and drains are part of the base's storm water collection system.

3.1.5 Geology and Soils

Proposed Action Site - Many of the soils in the vicinity of the Proposed Action Site have been disturbed due to site development activities, including the clearing and grading of the site. Undisturbed soils in the vicinity of the Proposed Action Site are classified in the county soil survey as "Lucy sand, 0 to 5 percent slopes," which is described as deep, well-drained and somewhat excessively drained soil on uplands (United States Department of Agriculture [USDA], 1967). The site consists of mowed lawn with areas of bare soil. Current site activities and operations do not significantly adversely impact on-site or off-site soils, and soil contamination is not known to exist at the site.

Existing Control Tower (Building 37) Site - Many of the soils in the vicinity of the existing Control Tower Site have been disturbed due to construction. Prior to the development of the Site, the soils in the area were classified in the county soil survey as "Lucy sand, 0 to 5 percent slopes."

Current site activities and operations do not significantly adversely impact on-site or off-site soils. However, the existing Control Tower is located within the footprint of soil contamination for Solid Waste Management Unit (SWMU) 60. In most areas, the soil contamination begins at approximately 8 to 10 feet below ground surface (bgs) and extends down into the groundwater table as deep as 15 feet. In the area of the former and existing fuel lines (located along Taxiway G and H), soil contamination is presumed to exist below the lines beginning from a depth of approximately 4 feet bgs. Below the fuel lines, contamination is estimated to spread laterally approximately 8 to 12 feet on either side. The soil contamination in this area is characterized as fuel-related.

3.1.6 Groundwater

Proposed Action Site - Depth to groundwater in the vicinity of the Proposed Action Site is estimated to fluctuate at an average depth of approximately 40 feet bgs. Current and past operations at the Proposed Action Site are not known to have adversely impacted groundwater conditions. Based on the review of a limited Phase II site investigation

report prepared by Shaw Environmental, Inc. (Shaw), in August 2005 groundwater depth was measured in an area located approximately 400 feet east of the subject property. Depth to groundwater in this area was measured at 41.9 feet bgs. Groundwater contamination was not identified in this nearby area.

Existing Control Tower (Building 37) Site - Groundwater monitoring wells are located in the immediate vicinity of the Control Tower (Building 37). Groundwater in this area is documented as being approximately 12 feet bgs. Current operations at the Existing Control Tower Site are not known to have adversely impacted groundwater conditions. However, the existing Control Tower is located within the footprint of groundwater contamination for SWMU 60. The groundwater contamination is associated with the former and existing fuel lines (located along Taxiway G and H). The groundwater contamination in this area is characterized as fuel-related.

3.1.7 Water Supply and Drinking Water

No groundwater drinking wells are located within the boundaries of the Proposed Action Site or the Existing Control Tower (Building 37) Site. Potable water distribution pipes are located at the periphery of the Proposed Action Site running parallel to the surrounding roads; potable water is not currently used on site. Potable water distribution pipes supply water to the existing Control Tower building. Potable water is currently used for 78th OSS operations in the restroom and breakroom areas within the facility.

3.2 AIR QUALITY

3.2.1 Regional Air Quality

Robins AFB is located in an attainment area, indicating that the National Ambient Air Quality Standards (NAAQS) are being met in Houston County.

3.2.2 Air Emission Sources

Robins AFB is compliant with its Title V permit issued on November 14, 2003 (Air Quality Permit #9711-153-0033-V-01-2).

Air emissions are not currently produced at the Proposed Action Site. Insignificant mobile source air emissions are currently generated by the 78th OSS personnel's privately owned vehicles (POV) using the parking lots in front of the Control Tower. Insignificant stationary source air emissions from a diesel fuel-powered emergency generator are also currently being generated at the Control Tower. The generator is tested monthly to verify proper operation and could run for a 72-hour period in the event of a power outage.

3.3 WASTE MANAGEMENT AND TOXIC MATERIALS

3.3.1 Wastewater

Base-generated sanitary sewage is treated at Robins AFB's sanitary sewage treatment plant, and effluent is monitored for biological oxygen demand, chemical oxygen demand, coliform bacteria, pH, oil and grease, ammonia, metals, suspended solids and chlorine. Discharges currently are within National Pollutant Discharge Elimination System permit limits.

Proposed Action Site - Sanitary sewer lines parallel the Proposed Action Site at the western border of the site, along Eagle Avenue. Industrial wastewater collection lines are located to the south and west, along Mustang Street and Eagle Avenue, respectively. Connections to the sanitary sewer and industrial wastewater collection lines are not currently provided to the Proposed Action Site, as neither waste is generated at that site.

Existing Control Tower (Building 37) Site - Sanitary sewer service is currently provided to the Control Tower Site. Sanitary sewage is generated by the 26 78th OSS personnel. No industrial wastewater is currently generated within the boundaries of the Control Tower Site.

3.3.2 Solid Waste

Solid wastes are generated from all areas of Robins AFB, including base housing, municipal operations, office complexes, industrial facilities, and construction/demolition areas. An *Integrated Solid Waste Management Plan* (ISWMP) has been developed to establish an integrated approach to dealing with solid waste management issues at Robins AFB. The approach includes source reduction, recycling, and disposal. Solid wastes that cannot be recycled are collected and transported to the Houston County landfill for disposal. Houston County has committed to providing solid waste disposal services to Robins AFB and has a permitted facility with 40 years of useful life. Approximately 50 years of additional capacity could be acquired through expansion of the landfill if needed. Solid wastes destined for recycling are collected at various locations on base in waste-specific containers or are turned in to the Defense Reutilization and Marketing Office (DRMO).

Proposed Action Site – Solid waste is not generated or stored at the Proposed Action Site. However, debris generated during the initial construction of the nearby airfield has been buried or disposed in the general area of the Proposed Action Site. These materials would have consisted of construction debris (concrete, metal and wood) and other inert materials. No environmental concerns are known to exist in association with these materials. The area of the Proposed Action Site is not currently used for disposal purposes.

Existing Control Tower (Building 37) Site - Solid waste associated with the activities in Control Tower includes kitchen waste, paper, plastics, metal and glass containers, and standard housekeeping materials, and is handled in accordance with Robins AFB's ISWMP. The quantities are consistent with those generated by typical office operations.

3.3.3 Hazardous Materials and Waste

Robins AFB has implemented a *Hazardous Waste Reduction Plan* (HWRP) (WR–ALC, 2006) that focuses on reducing or eliminating the use of hazardous materials. Hazardous

materials are stored and handled in accordance with Occupational Safety and Health Administration (OSHA) regulations 29 Code of Federal Regulations (CFR) 1910.1200(e) through (h), *Hazard Communication.* Hazardous waste is managed under the Resource Conservation Recovery Act (RCRA) S*tandards Applicable to Generators of Hazardous Waste* (40 CFR Part 262), and Georgia Rule 391-3-11, *Hazardous Waste Management,* and Robins AFB's Hazardous Waste Facility Permit. Universal waste is stored and handled in accordance with the *Standards for Universal Waste Management* (40 CFR Part 273) and Robins AFB's *Hazardous Waste Management Plan*. All hazardous waste is handled and disposed of in accordance with Robins AFB's *Hazardous Waste Management Plan*, the installation's Hazardous Waste Facility Permit, and all local, state, and Federal regulations. Background information relative to hazardous materials and hazardous waste as it relates to Robins AFB is presented in **Section 12.2** of **Appendix A**.

No hazardous materials are stored and no hazardous waste is currently generated at the Proposed Action Site or the Control Tower Site.

3.3.4 Toxic Materials

Background information relative to toxic materials as it relates to Robins AFB is presented in **Section 12.3** of **Appendix A**.

Proposed Action Site - Permanent building structures, which could contain asbestos-containing materials (ACM) and lead-based paint (LBP), are not located on the Proposed Action Site. In addition, no polychlorinated biphenyl (PCB)-containing equipment is located within the boundaries of the site.

Existing Control Tower (Building 37) Site- Comprehensive surveys for ACM and LBP have not been performed for Building 37. However, limited asbestos bulk sampling has been conducted at the Control Tower. Identified asbestos-containing materials include: floor tile, floor tile mastic, and "liquid nail" adhesive. Given the construction date of the structure (1972), the potential exists for LBP and additional ACM to be present in the building. No PCB-containing electrical transformer units are located within the

boundaries of this site. Given the construction date of the structure, the potential exists for PCB-containing fluorescent light ballasts to be present in the building.

3.4 NOISE ENVIRONMENT

Proposed Action Site - No significant noise is currently being generated from the Proposed Action Site. Off-site noise is generated by aircraft on the adjacent airfield and vehicles on the adjacent roadways. Based on the most recent noise contour data, the Proposed Action Site is located in the area subject to levels between 75 and 79 decibel day/night levels (Middle Georgia Regional Development Center, 2004). These decibel levels are equivalent to those produced by a vacuum cleaner, hair dryer or traffic along a busy street. These levels are below the Air Force Occupational Safety and Health (AFOSH)-established exposure limit of 85 decibels (by 8-hour time weighted average) that requires use of Personal Protective Equipment to protect hearing.

Existing Control Tower (Building 37) Site – Based on the most recent noise contour data, the Control Tower is located in the area subject to levels between 80 and 84 decibel day/night levels (Middle Georgia Regional Development Center, 2004). These decibel levels are equivalent to those produced by traffic along a busy street, a motorcycle or an electric shaver.

No significant noise is currently being generated from the Control Tower Site. Off-site noise is generated by aircraft on the adjacent airfield and by industrial buildings and several engine test facilities. Excessive noise from these adjacent facilities has been identified as a problem by personnel in the tower cab.

A noise exposure survey performed in November 2004 upon request from personnel in the Control Tower determined the noise-level exposures of Air Traffic Controllers assigned to the Control Tower (Building 37). Workers in this facility had been complaining of excess noise inside the tower cab resulting from C-5 and F-15 engines run-ups at their respective functional test areas which are located nearby. Individual noise exposures were determined using noise dosimetry. The maximum daily equivalent

continuous noise level (ECL) was 85 dBA (or decibels adjusted for the human range of hearing). This equals, but does not exceed, the 85 dBA hazardous noise criteria set forth by AFOSH Standard 48-19, *Hazardous Noise Exposure*. However, the environment within the tower cab remains noisy. As a result, communication is less than optimal and represents a potential hazard to flight safety.

3.5 BIOLOGICAL ENVIRONMENT

3.5.1 Flora

The Proposed Action Site, Control Tower Site and surrounding areas have been disturbed by previous grading and construction activities, and contain mostly developed or impervious surfaces. Flora located at the sites includes landscaped grasses.

3.5.2 Fauna

The Proposed Action Site, Control Tower Site and surrounding areas have been disturbed by previous development activities. The Proposed Action site consists of landscaped grasses and areas of bare soil. The Control Tower Site is developed with a tower and associated parking areas and outbuildings. The Sites offer minimal habitat for fauna. No fauna was observed during the site visit performed in support of this EA.

3.5.3 Endangered, Threatened and Sensitive Species

No threatened, endangered or sensitive plant or animal species or their habitats are located on or adjacent to the Proposed Action Site or Control Tower Site.

3.6 CULTURAL RESOURCES

Proposed Action Site - No permanent building structures are located on the Proposed Action Site. No National Register of Historic Places (NRHP)-listed or -eligible

structures are located within the viewshed of the Proposed Action Site. No archaeological sites have been recorded in the vicinity of the Proposed Action Site.

Existing Control Tower (Building 37) Site – The Control Tower Site is located in a heavily developed area of Robins AFB. No archaeological sites have been recorded in the immediate vicinity of the site. No structures listed or potentially eligible for listing on the NHRP are located on the site or in the viewshed of the site.

3.7 SOCIOECONOMIC ENVIRONMENT

Socioeconomic resources include the basic attributes and resources associated with the human environment. In particular, this includes population and economic activity. Economic activity typically encompasses employment, personal income and industrial growth.

Proposed Action Site - No operations occur at the Proposed Action Site; therefore, no employees or expenditures are currently associated with the Proposed Action Site.

Existing Control Tower (Building 37) Site - Air traffic control functions are currently performed at the site by 26 members of 78th OSS. The tower operates 24 hours per day seven days a week and conducts 34,000 - 40,000 aircraft operations annually.

3.8 TRANSPORTATION AND SAFETY

At Robins AFB, safety issues are those that directly affect the protection of human life and property, and principally involve aviation, munitions and fire prevention. In addition, Air Force personnel are protected by observing OSHA, Air Force Occupational Safety and Health (AFOSH) standards, Robins AFB safety requirements and RCRA (see **Section 3.3.3**).

Proposed Action Site - No regular operations occur at the Proposed Action Site. The site is located in an area of little traffic congestion and has direct access to Eagle Avenue,

Mustang Street, Centurion Boulevard and the flightline. Currently, no transportation or safety issues are associated with the Site or the surrounding roads.

Existing Control Tower (Building 37) Site- Air traffic control functions are currently performed at the site by members of 78th OSS. The area of the Control Tower Site is located midfield on the western side of the airfield at the intersection of Taxiways B, G and H. The Site is accessed from a single paved road and is located in an area of little traffic congestion. However, 78th OSS personnel (and support personnel) drive on the airfield/industrial area to access the Site; driving on the airfield by non-essential personnel is preferably avoided.

The existing space within the Control Tower is not sufficient for current operations and equipment requirements. The tower cab, by current standards, is too small and cramped to accommodate all the occupants and trainees. A conventional steel staircase serves as the main access from the first to the seventh floor with a steep "ships ladder" for access to the tower cab from the seventh floor. A small, half-height door serves as access to the narrow tower catwalk. In the event of a fire, a Baker Life Chute device (tubular netting used for rapid evacuee descent) would serve as the only means of emergency egress.

The electrical and grounding systems at the Control Tower are inadequate for future equipment installations. The structural, mechanical, and electrical components of the tower facility have declined to the point that repairs are required with greater frequency. Crowded cab conditions are a problem that limit air traffic controller mobility, prevent functional and efficient operational procedures, and result in less than optimal controller communications.

This page intentionally left blank.

4.0 ENVIRONMENTAL EFFECTS

This chapter describes the potential environmental effects of implementing the Proposed Action and the No-Action Alternative. Potential effects of actions are based on the description of the actions as presented in **Section 2** and existing environmental conditions of each site as presented in **Section 3**. Environmental effects from the No-Action Alternative address effects as they currently occur or could occur in the future.

4.1 PHYSICAL ENVIRONMENT

4.1.1 Topography

4.1.1.1 No-Action Alternative

Under the No-Action Alternative, the topography of Robins AFB would remain unchanged because no construction and demolition would occur. In addition, the topography at Robins AFB is not currently being significantly impacted by the activities at the subject sites. Implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to the topography at or near Robins AFB.

4.1.1.2 Proposed Action

Construction of ATCT: The construction phase of the Proposed Action would require minimal grading of portions of the Proposed Action Site due to the current topography and based on preliminary information regarding the design of the facility. No significant positive or significant adverse impacts to topography would result from implementation of the Proposed Action. See **Section 4.1.4.2** for potential impacts to surface waters from soil erosion and storm water runoff

Demolition of Existing Control Tower: Demolition of the existing Control Tower would not significantly change the topography of the Existing Control Tower Site

because the removal of the existing control tower would not require permanent alteration of the ground surface at the site.

78th OSS Operations: No change to, or positive or adverse impacts to topography would result from the operational aspects of the Proposed Action because no functions affecting the site topography would occur as a part of the 78th OSS operations.

4.1.2 Surface Waters

4.1.2.1 No-Action Alternative

Implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to surface waters near Robins AFB because no construction or demolition would occur and no changes to 78th OSS operations would be enacted. Surface waters would remain unchanged and surface waters are not currently being significantly impacted by the subject sites or activities at the sites.

4.1.2.2 Proposed Action

Construction of ATCT: Construction of the ATCT would not cause significant adverse impacts to surface waters. This is because the base uses Best Management Practices (BMPs) during the course of day-to-day operations, and plans to use BMPs such as silt fencing, hay bales and erosion-control blankets during construction of the ATCT to control land disturbance and storm water runoff so as not to cause significant adverse impacts to surface waters. See **Section 4.1.4.2** for potential impacts to surface waters from soil erosion and storm water runoff during construction activities, and additional BMP information.

Demolition of Existing Control Tower: Demolition of the existing Control Tower would not cause significant adverse impacts to surface waters. This is because the base uses BMPs during the course of day-to-day operations, and plans to use BMPs such as silt fencing, hay bales, erosion-control blankets during the demolition of the Control

Tower to control land disturbance and storm water runoff so as not to cause significant adverse impacts to surface waters. See **Section 4.1.4.2** for potential impacts to surface waters from soil erosion and storm water runoff from demolition activities, and additional BMP information.

78th OSS Operations: 78th OSS operations that would occur outdoors include the filling of a diesel fuel AST. Diesel fuel for the proposed emergency generator unit would be delivered to and stored at the site. Storm water flowing over the new impervious surfaces including the new employee vehicle parking lot would flow into the existing storm sewer system and discharge to surface waters.

The base uses BMPs during day-to-day operations to reduce the potential for products such as diesel fuel for the emergency generator and leaks of liquids from on-site parked vehicles to adversely affect surface water. The BMPs address the control and cleanup of inadvertent releases of potential contaminants before a release could adversely affect surface water. These BMPs also address AST filling procedures and having spill control materials on hand during filling to control potential spillage, so as not to cause significant adverse impacts to surface water.

4.1.3 Floodplains and Wetlands

4.1.3.1 No-Action Alternative

Under the No-Action Alternative, floodplain characteristics would remain unchanged and wetlands would not be impacted because no construction or demolition would occur and no changes to 78th OSS operations would be enacted. In addition, these resources are not currently being significantly impacted by the subject sites or activities at the sites. Implementation of the No-Action Alternative would cause neither significant positive nor significant negative effects to floodplain characteristics and wetlands near Robins AFB.

4.1.3.2 Proposed Action

The construction and demolition phases of the Proposed Action, and future 78th OSS operations associated with the implementation of the Proposed Action would result in neither significant positive nor significant negative effects to floodplains or wetlands. No changes to the 100-year floodplain or to existing wetland areas near or receiving storm water runoff from the sites would occur under the Proposed Action.

4.1.4 Storm Water

4.1.4.1 No-Action Alternative

Implementation of the No-Action Alternative would cause neither significant positive nor significant negative effects to storm water near Robins AFB because no changes to storm water or the storm water conveyance system would occur, and storm water is not currently being significantly impacted by the subject sites or activities on the sites.

4.1.4.2 Proposed Action

Construction of ATCT: Construction of the ATCT would not cause significant adverse impacts to storm water. This is because the base uses BMPs during the course of day-to-day operations, and plans to use BMPs such as silt fencing, hay bales and erosion-control blankets during the construction of the ATCT to control storm water runoff so as not to cause significant adverse impacts.

The proposed construction of the ATCT and associated grounds would impact approximately one acre at the Proposed Action Site. The excavation of possible debris and fill and grading operations would increase the potential for soil erosion and degradation of surface water runoff. The new facility and associated paved areas would cover the majority of the site. Impervious area at the Proposed Action Site would increase, as a greater percentage of the site's surface area would be covered by buildings and pavement, thus increasing the rate and volume of storm water runoff. The

construction project would be designed and the existing area would be modified to include low impact development (LID) features, if needed, to sufficiently delay runoff of surface water from high-intensity storms and control erosion and subsequent sedimentation so as not to cause significant adverse impacts.

In addition to meeting applicable building codes for the construction of the new ATCT facility, the building contractor will be required to satisfy all relevant environmental requirements, submittals and permits related to the proposed project. The permit process includes submission of Notice of Intent for permit coverage under National Pollutant Discharge Elimination System (NPDES) General Permit 100001 to discharge storm water associated with construction activity; development and approval of an Erosion, Sediment and Pollution Control Plan that meets the requirements of the Permit, while written in accordance with Georgia Soil and Water Conservation Commission's *Manual for Sediment and Erosion Control in Georgia, 5th Edition*; following of the applicable county water protection ordinance; obtaining a Houston County Sediment and Erosion Control Permit; submittal of land disturbance fees to Georgia Environmental Protection Division (EPD) and Houston County; obtaining of a dig permit from 78th CEG to identify underground utilities; review of the base's day-to-day BMP operations and plans; and submission of a Notice of Termination to Georgia EPD following completion of work when site conditions meet the definition of "final stabilization." Permit requirements also include performing periodic site inspections, sampling storm water discharges from the construction site, and analyzing turbidity of storm water runoff, performed in accordance with 40 CFR 136.

All permit applications would be submitted to 78th CEG/CEV for review prior to final submittal to governing authorities.

Demolition of Existing Control Tower: Demolition of the existing Control Tower would occur after 78th OSS operations and personnel are relocated to the new ATCT. The proposed demolition activities would impact approximately one acre at the Existing Control Tower Site and would be subject to the requirements described in the preceding subsection of **Section 4.1.4.2.** Demolition of the Control Tower would not cause

significant adverse impacts to storm water. This is because the base uses BMPs during the course of day-to-day operations, and plans to use BMPs such as silt fencing, hay bales, and erosion-control blankets during demolition of the Control Tower to control land disturbance so as not to cause significant adverse impacts.

78th OSS Operations: See **Section 4.1.2.2** regarding the discussion of potential impacts to surface water from storm water runoff. No operations would occur outdoors that would result in adverse impacts to storm water.

4.1.5 Geology and Soils

4.1.5.1 No-Action Alternative

No changes to geology or soils at the subject sites or Robins AFB would occur under the No-Action Alternative because construction and demolition would not occur and no changes to 78th OSS operations would be enacted. In addition, these resources are not currently being significantly impacted by the subject sites or activities at the sites. Conducting no action would produce neither significant positive nor significant negative effects.

4.1.5.2 Proposed Action

Construction of ATCT: Geology would not be affected as a result of construction activities, as construction activities would not be deep enough to affect geologic resources. As discussed previously in **Section 4.1.4.2,** as a result of construction activities associated with the Proposed Action, the potential for soil erosion and the potential for eroded soil to adversely affect the quality of storm water runoff would increase. However, due to the base's use of BMPs during the course of day-to-day operations, and plans to use BMPs such as silt fencing, hay bales and erosion-control blankets during the construction of the ATCT, soil erosion and the quality of storm water runoff would be controlled so as not to cause significant adverse impacts.

Demolition of Existing Control Tower: Associated with demolition of the Control Tower, 78th CEG/CEV would conduct sampling at the site if excavation activities (including removal of building footers and subsurface utilities) were required in areas of potential soil contamination. In addition, intrusive work would be carefully planned and coordinated to assure appropriate health and safety (H&S) protocols are followed. Although direct contact with contaminated soil is not expected to occur, excavations have the potential to release vapors. Monitoring would be performed for petroleum-related vapors in excavations conducted in this area. Waste characterization sampling would be performed as needed, and the excavated soil and waste materials would be managed and disposed of accordingly. If contaminated soil were found, its removal and proper disposal would be a beneficial effect of the project. Any excavated soils determined to be hazardous waste would be managed and disposed of appropriately; if found to be non-hazardous, the soil would be stockpiled on the base for potential future reuse, and any waste material would be properly disposed of as solid waste. Any hazardous waste generated would be disposed of through the DRMO.

The underlying geologic resources at the Existing Control Tower Site would not be significantly impacted because the demolition of the Control Tower would not be deep enough to impact geologic features at the site.

78th OSS Operations: Future 78th OSS operations at the ATCT would result in neither significant positive nor significant negative effects to the geology or soils at Robins AFB because no functions affecting the site geology and soil would occur as a part of the 78th OSS operations.

4.1.6 Groundwater

4.1.6.1 No-Action Alternative

Implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to groundwater because no changes to groundwater

resources would occur and groundwater is not currently being significantly impacted by the subject sites or activities at the sites.

4.1.6.2 Proposed Action

Construction of ATCT: The construction phase of the Proposed Action would not impact groundwater at the site. Design plans would specify the ATCT foundation thickness and depth of pilings as needed. Pilings for this size ATCT are expected to extend no more than 15 feet bgs, about 5 to 10 feet above the fluctuating average groundwater depth of approximately 20 to 25 feet bgs. As the new construction is not expected to be deep enough to impact or intersect groundwater, conducting the Proposed Action would produce neither significant positive nor significant negative effects to groundwater.

Demolition of Existing Control Tower: The demolition phase of the Proposed Action would not impact groundwater at the site as the demolition activities would not be deep enough to impact or intersect groundwater. Conducting the Proposed Action would produce neither significant positive nor significant negative effects to groundwater.

78th OSS Operations: Future 78th OSS operations associated with the Proposed Action would not impact groundwater at Robins AFB and would produce neither significant positive nor significant negative effects to groundwater.

4.1.7 Water Supply and Drinking Water

4.1.7.1 No-Action Alternative

No changes to existing water supply impacts and drinking water resources and usage would occur under the No-Action Alternative because no construction or demolition would occur and no changes to 78th OSS operations would be enacted. In addition, these resources are not currently being significantly impacted by the subject sites or activities

at the sites. Implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to water supply and drinking water.

4.1.7.2 Proposed Action

Implementation of the Proposed Action would not affect the existing water supply at Robins AFB to a significant degree, and overall drinking water consumption at Robins AFB would not increase as a result of the Proposed Action.

Construction of ATCT: Existing water pipes located in the area surrounding the Proposed Action Site construction area would be tied into the new facility as a result of construction of the new ATCT. Potential impacts to surface waters and soils as a result of the construction activities are discussed in Sections 4.1.2.2 and 4.1.5.2, respectively.

Water service would be interrupted for a short time period and could occur over a weekend to further minimize disruption to customers.

Limited amounts of water would be used for curing of concrete and other related construction activities. The amount required would be insignificant when compared to availability of potable water at Robins AFB.

Demolition of Existing Control Tower: Demolition of the existing Control Tower would not affect the existing water supply at Robins AFB and the potable water use at Robins AFB would not increase significantly as a result of the demolition activities.

78th OSS Operations: Water utilization at the new ATCT would consist primarily of sanitary uses by facility personnel and would be consistent with the water usage at the existing Control Tower since the same number of personnel at the existing Control Tower would work at the new ATCT.

4.2 AIR QUALITY

Potential air emissions resulting from the Proposed Action and No-Action Alternative have been evaluated based on the Clean Air Act as amended. The effects of an action are considered significant if they increase ambient air pollution concentrations above NAAQS, contribute to an existing violation of NAAQS, or interfere with or delay the attainment of NAAQS.

4.2.1 No-Action Alternative

No changes to air emissions would occur under the No-Action Alternative because no construction or demolition would occur and no changes to 78th OSS operations would be enacted. In addition, air quality is not currently being significantly impacted by the subject sites or activities at the sites. Implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to air emissions.

4.2.2 Proposed Action

Construction of ATCT: Construction of the ATCT would not cause significant adverse impacts to air quality due to fugitive dust. This is because the base uses BMPs during the course of day-to-day operations. The BMPs for dust would include procedures for wetting disturbed portions of the project areas during periods of excessive dryness; therefore avoiding any significant adverse impacts.

It is estimated that construction of the new ATCT would take 16 to 18 months, with an additional 6 to 8 months required for equipment installation to make the tower operational. Implementation of the Proposed Action would increase emissions of carbon monoxide, hydrocarbons and nitrogen oxides from construction employee traffic and operation of heavy equipment during this approximately 18-month time period. However, because the increase in commutation trips and emissions from construction worker vehicles would be temporary and emissions from heavy vehicles would also be relatively limited in quantity and duration, these emissions would be insignificant.

Demolition of Existing Control Tower: In order to address air emissions associated with the demolition of the existing Control Tower, surveys would be performed to identify ACM and LBP building materials in the structure prior to any demolition activities (see **Section 4.3.4.2**). If ACM were found, the contractor would be required to satisfy the following environmental requirements, submittals, and permits related to the removal of ACM at the proposed project sites: demolition plans would be prepared and implemented to provide for safe removal and disposal of ACM and LBP materials in the affected building in accordance with applicable regulations; the contractor would be required to follow the permit process in accordance with the Georgia Department of Natural Resources (GDNR), EPD, Asbestos Program requirements; and all permit applications would be submitted to 78th CEG/CEV for review prior to final submittal to governing authorities.

The demolition design plan for the existing Control Tower would incorporate methods for and be coordinated with ACM and LBP abatement activities to maintain air quality. Furthermore, demolition of the Control Tower would not cause significant adverse impacts to air quality due to fugitive dust. The base uses BMPs during the course of day-to-day operations, as outlined in the Erosion, Sediment and Pollution Control Plan. The BMPs for dust would include procedures for wetting disturbed portions of the project areas during periods of excessive dryness; therefore any increase in fugitive dust would not cause significant adverse impacts.

It is estimated that demolition and removal of the Control Tower would take 6 months. Demolition activities would increase emissions of carbon monoxide, hydrocarbons, and nitrogen oxides from demolition/construction worker traffic and operation of heavy equipment. However, because the increase in commutation trips and emissions from construction worker vehicles would be temporary and emissions from heavy vehicles would also be relatively limited in quantity and duration, these emissions would not cause significant adverse impacts to air quality.

78th OSS Operations: Since the total number of 78th OSS personnel at the ATCT would not change, the amount of air emissions from employee vehicles would not change

significantly. Mobile emissions from employees driving to and parking in an available parking spot would also not change significantly.

An emergency generator unit would be installed at the new ATCT. If the unit is manufactured after April 1, 2006, the manufacturer must certify that the engine meets the emissions standards in 40 CFR 60 Subpart IIII (60.4200 - 60.4219). If this certification is not available, local testing will be required and add-on controls will be needed if the unit does not meet the emission standards in the regulations. Given the size (120 to 140 kilovolt-ampere [kVA]) and limited use of the generator (during power outages and testing), the unit does not represent a significant air emissions source, and Robins AFB's air permit will be modified to include the new air emission source associated with the new facility.

Based on the above-described assessment, implementation of the Proposed Action would not cause any violations of the NAAQS and would not significantly increase air emissions at Robins AFB. Air emissions associated with the Proposed Action would be compliant with Robins AFB's Title V permit.

4.3 WASTE MANAGEMENT AND TOXIC MATERIALS

4.3.1 Wastewater

4.3.1.1 No-Action Alternative

Under the No-Action Alternative, sanitary and industrial wastewater would not be affected. Sanitary wastewater would continue to be generated by the existing Control Tower at current levels. Industrial wastewater is not generated at the existing Control Tower. Thus, implementation of the No-Action Alternative would not result in significant adverse or significant positive impacts to the environment as it relates to wastewater.

4.3.1.2 Proposed Action

Construction of ATCT: The new ATCT would be connected to the existing sanitary sewer system lines located along the periphery of the site. Construction activities associated with the Proposed Action would produce neither significant positive nor significant negative effects to sanitary and industrial wastewater generation at Robins AFB.

Demolition of Existing Control Tower: Sanitary wastewater would no longer be generated at this site after the 78th OSS personnel were relocated to the new ATCT. Demolition activities at the Existing Control Tower Site would produce neither significant positive nor significant negative effects to sanitary and industrial wastewater generation at Robins AFB.

78th OSS Operations: Sanitary wastewater would be generated at the new ATCT Site by the 78th OSS personnel that would be relocated from the existing Control Tower. The existing sanitary wastewater system near the Proposed Action Site would be tapped into and used for the disposal of sanitary wastewater generated by the 78th OSS operations. The amounts and types of wastewater would be similar to those generated by the current operations located in the existing Control Tower. 78th OSS operations would produce neither significant positive nor significant negative effects to sanitary and industrial wastewater generation at Robins AFB.

4.3.2 Solid Waste

4.3.2.1 No-Action Alternative

No significant adverse or significant positive impacts would occur to solid waste and the physical environment as it relates to solid waste because no change in the volume or handling of solid waste would occur at Robins AFB, and existing solid waste handling and disposal does not significantly impact the physical environment.

4.3.2.2 Proposed Action

Implementation of the Proposed Action would result in no significant positive or significant negative impacts to solid waste or to the physical environment as it relates to solid waste. As stated in **Section 3.3.2**, Houston County has committed to providing solid waste disposal services to Robins AFB, has a permitted facility with 40 years of useful life, and the county could acquire approximately 50 years of additional capacity through expansion of the landfill if needed. Hence, adequate space is available in the Houston County landfill for the solid waste that would be generated from this project. Waste materials containing ACM or LBP would be handled in accordance with applicable regulations (see **Section 4.3.4.2**).

Construction of ATCT: Conducting the Proposed Action would temporarily increase the generation of solid waste from construction activities at the new ATCT Site. Buried construction debris might be encountered during site grading and excavation activities, as debris generated during the initial construction of the airfield has been buried or disposed in the general area of the Proposed Action Site. This construction debris would have consisted of concrete, metal, wood and other inert materials. Building construction activities would also produce solid waste. All debris and waste materials would be recycled to the extent possible. Waste that is not recyclable would be disposed by the building contractor in approved local landfill facilities.

Demolition of Existing Control Tower: Conducting the Proposed Action would temporarily increase the generation of solid waste from demolition activities at the Existing Control Tower Site. Complete demolition of the Control Tower building on the site would produce waste concrete, asphalt, metal, and wood and other construction materials. Waste materials would be recycled to the extent possible. Waste that is not recyclable would be disposed by the building contractor in approved local landfill facilities.

78th OSS Operations: Waste would be generated on a long-term basis from operation of the new ATCT facility, and would be similar in nature to that currently generated. Wastes

would be recycled to the extent possible and would not cause significant environmental effects.

Solid wastes generated in association with the Proposed Action would be handled in accordance with Robins AFB's ISWMP.

4.3.3 Hazardous Materials and Waste

4.3.3.1 No-Action Alternative

Under the No-Action Alternative, use of hazardous materials and generation of hazardous waste would not be affected. The No-Action Alternative would cause neither significant positive nor significant negative environmental effects related to hazardous materials and hazardous waste.

4.3.3.2 Proposed Action

Implementation of the Proposed Action would cause neither significant positive nor significant negative environmental effects related to hazardous materials and hazardous waste.

Construction of ATCT: Hazardous materials, such as fuels for construction equipment and vehicles, would be used during the site development and construction activities. These materials would be used and handled in accordance with Robins AFB's HWMP and all applicable regulations, and significant adverse impacts would not occur due to their usage.

Demolition of Existing Control Tower: Excavated soil and building materials removed from the area of the Control Tower would be sampled for waste characterization as necessary. If contaminated soil material was identified, corrective action would be regulated under the corrective action portion of the installation's Hazardous Waste Facility Permit. Any excavated soil and building debris that is determined to be

hazardous waste would be segregated from other materials to the extent possible, and managed and disposed of as hazardous waste. Any hazardous waste generated would be disposed of through the DRMO.

Hazardous materials, such as fuels for demolition equipment and vehicles, would be used during the site demolition activities. These materials would be used and handled in accordance with Robins AFB's HWMP and all applicable regulations, and significant adverse impacts would not occur due to their usage.

78th OSS Operations: Hazardous waste would not be generated on a short-term or long-term basis from 78th OSS operations at the new ATCT site.

Hazardous wastes generated in association with the Proposed Action would be handled and disposed of in accordance with Robins AFB's *Hazardous Waste Management Plan,* the installation's Hazardous Waste Facility Permit, and all local, state, and Federal regulations.

4.3.4 Toxic Materials

4.3.4.1 No-Action Alternative

The No-Action Alternative would cause neither significant positive nor significant negative environmental effects related to toxics and toxic waste because toxic materials would not be affected and these materials are not currently significantly impacting the environment.

4.3.4.2 Proposed Action

Construction of ATCT: Implementation of the Proposed Action would not significantly adversely or significantly positively impact toxic materials or toxic waste or the environment as it relates to these materials because no known ACMs, LBPs, PCBs or PCB-containing equipment would be disturbed by construction at the Proposed Action

Site. Furthermore, if encountered, any materials and waste would be managed and disposed of per applicable regulations and disposal is a permitted activity.

Demolition of Existing Control Tower: Demolition of the existing Control Tower would not significantly adversely or significantly positively impact toxic materials or toxic waste or the environment as it relates to these materials because the materials and waste would be managed and disposed of per applicable regulations, and disposal is a permitted activity. ACM and LBP surveys would be performed on the structure prior to demolition. Identified ACM and LBP would be removed and disposed of in accordance with applicable regulations. Removal of ACM and LBP under the Proposed Action would be a positive impact.

78th OSS Operations: Operations would not involve the use of ACM, LBP or PCB-containing equipment as the use of these materials in new construction at Robins AFB is currently prohibited.

4.4 NOISE ENVIRONMENT

4.4.1 No-Action Alternative

Implementation of the No-Action Alternative would not result in significant positive or significant negative effects to the noise environment because the noise environment would not change. However, the Existing Control Tower Site is located in an area surrounded by industrial buildings and several engine test facilities. The excessive noise pollution from the surrounding environment would continue to subject 78th OSS personnel in the cab to less than optimal work conditions.

4.4.2 Proposed Action

Construction of ATCT: Site development and new construction activities would not result in significant adverse impacts to the noise environment because these activities would be short-term, localized and sufficiently distanced from the nearest sensitive

receptor elements. Workers would wear ear protection, as necessary, for construction activities requiring this level of protection.

Demolition of Existing Control Tower: Demolition of the existing Control Tower would result in short-term, localized, and potentially loud noise impacts during construction. The demolition activities would not impact the noise environment at Robins AFB to a significant degree.

78th OSS Operations: Noise from future 78th OSS operations in the new ATCT would be generally consistent with noise from the existing operations, which do not significantly impact the environment. 78th OSS personnel would be exposed to noise from the nearby airfield and surrounding streets. Based on the most recent noise contour data, the Proposed Action Site is located in an area subject to levels between 75 and 79 decibel day/night levels. These levels indicate that the new ATCT is sited in a noisy outdoor environment, but the new ATCT would incorporate noise dampening features into the design.

4.5 BIOLOGICAL ENVIRONMENT

4.5.1 No-Action Alternative

The No-Action Alternative would have neither significant positive nor significant negative impacts on the biological environment. Natural resources would not be disturbed.

4.5.2 Proposed Action

The construction and demolition phases of the Proposed Action, and future 78th OSS operations associated with the implementation of the Proposed Action would have neither significant positive nor significant negative impacts on the biological environment. The Proposed Action would not result in a significant impact to wildlife and vegetation due to modification or removal of the minimal amount of existing vegetation at the sites where

construction and demolition activities are proposed. No endangered, threatened, or sensitive species would be affected by the Proposed Action at the Sites, as no species or their habitats are located in these areas.

4.6 CULTURAL RESOURCES

4.6.1 No-Action Alternative

Conducting no action would have no effect on cultural resources because no construction or demolition would occur and no changes to 78th OSS operations would be enacted. In addition, these resources are not currently being impacted by the subject sites or activities at the sites. Cultural resources on Robins AFB would continue to be managed and protected as required by federal and state agencies.

4.6.2 Proposed Action

Construction of ATCT: Based on previous survey findings, no archaeological resources would be affected by construction of the new ATCT at the Proposed Action Site. No standing structures are located within the Proposed Action Site, and no effect on historic cultural resources on Robins AFB would occur due to the construction activities.

If artifacts are identified, excavation activities will cease and plans will be developed to address the resource, per Robins AFB's *Integrated Cultural Resources Management Plan* (ICRMP). When cultural resources are inadvertently discovered, project personnel are directed to avoid the site of discovery and immediately contact the Robins AFB Cultural Resources Manager (CRM). All work in the area of discovery must stop until it can be investigated. The CRM will send a qualified representative to visit the discovery site. The resource will then be recorded, evaluated, and the effects mitigated as necessary.

Georgia Department of Natural Resources Historic Preservation Division (HPD), in a letter dated 28 March 2008 (**Appendix B**), stated that they believe that no historic properties or archaeological resources that are listed in or eligible for listing in the NRHP

would be affected by this undertaking. 78th CEG/CEV will further coordinate with HPD if there are any changes to this project as proposed.

Demolition of Existing Control Tower: Based on previous survey findings, demolition of the existing Control Tower would not affect archaeological resources or historic structures on the site, nearby sites, or on Robins AFB. Any inadvertent discoveries of artifacts would be handled as described above.

78th OSS Operations: Operations would not affect archaeological or historic resources at Robins AFB.

4.7 SOCIOECONOMIC ENVIRONMENT

4.7.1 No-Action Alternative

The socioeconomic environment would not change significantly under the No-Action Alternative, when compared to the economy associated with Robins AFB and the Warner Robins area. Robins AFB would continue to exert a significant positive impact on the economy of the Middle Georgia region of influence. However, the benefits of construction and operating dollars associated with the new ATCT would not be realized. Minority populations and low-income populations would not be significantly adversely or significantly positively impacted, nor would significant environmental health risks and safety risks to children occur. Hence, implementation of the No-Action Alternative would result in neither significant positive nor significant negative effects to the socioeconomic environment.

4.7.2 Proposed Action

The Proposed Action would provide additional economic stimulus to the regional economy primarily through new construction expenditures. Construction of the new ATCT and demolition of the existing Control Tower is expected to cost approximately $9.4 million in the form of construction labor salaries, equipment, materials, site

improvements, pavements, communications and utilities. The construction would positively impact the economy, with expenditures mostly in the local area with local contractors, in FY 2013 through FY 2014, as the construction would take approximately 14 months to complete.

No significant adverse environmental impacts would occur as a result of the Proposed Action and no populations (minority, low-income, or otherwise) would be disproportionately impacted; therefore, no significant impacts with regard to environmental justice would occur.

4.8 TRANSPORTATION AND SAFETY

4.8.1 No-Action Alternative

Under the No-Action Alternative, there would be no significant positive or significant adverse effects to transportation or safety. 78th OSS personnel would continue to work in cramped conditions with outdated technology in the existing Control Tower. The structural, mechanical, and electrical components of the Control Tower facility would continue to decline to the point that repairs are required with greater frequency. Additional care and attention would be needed to ensure air traffic control operations perform at adequate safety standards. Improvements to the working environment and operations within a new ATCT would not be realized under the No-Action Alternative.

4.8.2 Proposed Action

Construction of ATCT: Implementation of the construction phase of the Proposed Action would not significantly positively or significantly adversely impact traffic and safety at Robins AFB or the surrounding area. Construction contractors would be required to follow appropriate Robins AFB and OSHA safety rules during transit to the new ATCT. Construction vehicles would enter the base through Gate 4 and drive approximately 3 miles to the Proposed Action Site, while construction workers in non-commercial vehicles could enter Robins AFB through any of the other entrance gates.

Construction activities would involve the operation of heavy machinery and other equipment. The base will require the construction contractor to implement actions consistent with governing regulations to ensure worker health and safety during construction.

Demolition of Existing Control Tower: Implementation of the demolition phase of the Proposed Action would not significantly positively or significantly adversely impact traffic and safety at Robins AFB or the surrounding area. Demolition contractors would be required to follow appropriate Robins AFB and OSHA safety rules during transit to the new ATCT. Construction vehicles would enter base through Gate 4 and drive approximately 2.5 miles to the Existing Control Tower Site, while construction workers in non-commercial vehicles could enter Robins AFB through any of the other entrance gates.

Demolition activities would involve the operation of heavy machinery and other equipment. Debris generated from the demolition of the Control Tower would be collected and transferred by trucks for proper off-site disposal (see **Section 4.3.2.2**). The base will require the contractor to implement actions consistent with governing regulations to ensure worker health and safety during demolition and removal.

78th OSS Operations: Traffic flow would increase in the area as the new ATCT became occupied; however, the increase would not be significant when considered in the context of other operations in the area. The 26 personnel working in the new ATCT would be required to follow Robins AFB driving rules and park their vehicles in parking spaces in existing parking lots in the vicinity of the Proposed Action Site. Ample parking space is available in the surrounding area.

The transfer of air traffic control activities into the new ATCT would allow for the modernization of air traffic control operations; would provide sufficient space for required air traffic control personnel, equipment and functions; would provide for a more optimal work environment; and would reduce the number of vehicles operating on the

airfield. Also, the new ATCT would meet the Antiterrorism/Force Protection requirements.

4.9 CUMULATIVE IMPACTS

Council on Environmental Quality (CEQ) regulations stipulate that potential environmental impacts resulting from cumulative impacts should be considered within an EA. A cumulative impact is the impact on the environment which results from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. In accordance with NEPA, a discussion of cumulative impacts resulting from projects that are proposed, currently under construction, recently completed, or anticipated to be implemented in the near future is presented below. No projects that are currently under construction were identified as potentially producing cumulative environmental effects in the area of the Proposed Action Site. One recently completed project and two future actions were identified as potentially producing cumulative environmental effects in the area of the Proposed Action Site. The actions are described as follows.

202nd Engineering Installation Squadron: Relocation of the 202nd Engineering Installation Squadron (EIS) on the western side of the airfield (between Centurion Boulevard and Perimeter Road) was identified as potentially producing cumulative environmental effects in the immediate vicinity of the Proposed Action area. The 202nd EIS plans to relocate existing vehicle maintenance and headquarters/operations functions to Buildings 2312 and 2350, respectively. To provide for a vehicle maintenance shop and associated parking shed, this project includes the renovation of approximately 8,550 square feet of existing building space and creation of 15,000 square feet of new parking area. To provide for a headquarters/operations facility, this project includes renovation/addition of approximately 29,000 square feet of existing interior building space to provide communications/electronics, training, shops, office and storage space. Approximately 125 personnel from the 202nd EIS would relocate from Middle Georgia Regional Airport in Macon, Georgia, to this area of Robins AFB as a part of this action. The approximately 125 personnel would consist of 16 full-time office/administrative staff and approximately 105 part-time ANG personnel. The

105 ANG personnel would only be on Robins AFB one weekend per month for training. The shop space located on the nearby B1 ramp is currently in full-time use by the 116th Air Control Wing (ACW) and the rest of the space is used occasionally.

The addition of shop space by the 202nd EIS would result in an insignificant increase in building maintenance services. The 202nd EIS project would increase the area of impermeable land surface by no more than approximately 44,000 square feet, and temporarily increase air emissions, noise, and volume of solid waste and toxic materials generated by construction/renovation activities. Due to the new operations and 125 additional personnel, on a long-term basis, this project would increase the generation of solid waste and sanitary wastewater, the consumption of potable water, and the number of vehicles on local roadways and entering Robins AFB.

Aircraft Maintenance Hangar: Construction of a new Aircraft Maintenance Hangar for the 402nd Aircraft Maintenance Group on the northern portion of Robins AFB, on the western side of the airfield at the southeastern corner of Perimeter Road and Eagle Street Extension, immediately west of Taxiway C was identified as potentially producing cumulative environmental effects in the immediate vicinity of the Proposed Action area. The new Aircraft Maintenance Hangar would be approximately 97,000 square feet in size and would be constructed on an approximately 15-acre parcel of land. Approximately 200 total personnel would be located at the Aircraft Maintenance Hangar, which would operate 24 hours a day (two shifts), seven days a week. Approximately 170 new civilian personnel would be hired for the increased workload anticipated at the hangar.

The construction activities associated with the Aircraft Maintenance Hangar project would increase the area of impermeable land surface by approximately nine acres (including building and paved areas) and temporarily increase air emissions, noise, and volume of solid waste and toxic materials generated by construction activities. Due to the new Hangar operations and associated 200 personnel, on a long-term basis, this project would increase the generation of solid waste and sanitary wastewater, the consumption of potable water, and the number of vehicles on local roadways and entering Robins AFB.

Fire and Crash Rescue Facility: The new Fire and Crash Rescue facility, located on the western side of the airfield (approximately 1,000 feet southeast of the intersection of Eagle Avenue and Perimeter Road) was identified as potentially producing cumulative environmental effects in the immediate vicinity of the Proposed Action area. The new Fire and Crash Rescue Facility is located immediately south of the new Aircraft Maintenance Hangar site. The development of the site has increased the area of impermeable land surface by approximately 1.5 acres (building and paved areas) and resulted in a temporary increase in air emissions, noise, and volume of solid waste and toxic materials generated by construction/demolition activities.

Potential cumulative effects of the above-listed projects will be addressed through existing permit requirements or by obtaining permit modifications as necessary.

Cumulative increases in storm water runoff due to increased impermeable area at the above-described Proposed Action sites would occur. Site-specific design features would be employed at each of the sites to limit the volume and rate of storm water runoff so that the effect of the cumulative volume of runoff is insignificant. The construction contractor will be required to implement practices under an approved Erosion, Sediment and Pollution Control Plan, designed for the resulting effects on storm water and surface water quality to be insignificant. Also, the cumulative effect of numerous construction projects on storm water will be addressed, as appropriate, under individual approved Erosion, Sediment and Pollution Control Plans, designed for the resulting effects on cumulative storm water and surface water quality to be insignificant.

The construction phase of these actions would increase carbon monoxide, hydrocarbons and nitrogen oxides from construction employee traffic and operation of heavy equipment. However, the increase in emissions from construction worker vehicles would be temporary and insignificant to the environment when considered in the context of Robins AFB and the nearby areas. Operation of the new ATCT would emit minimal air emissions.

Cumulative increases in the generation of solid waste would occur from construction activities. Waste materials would be recycled as feasible and would not be significant when compared to the total solid waste generation for Robins AFB.

The effects of noise generation from construction activities associated with the projects would be temporary and insignificant. Noise would not have a cumulative adverse effect on the environment.

Conducting these actions would produce slight positive effects within the region of economic influence during the construction of the facilities. The cumulative effect of the projects would result in significant beneficial economic impacts to the local economy.

The construction and operation of the ATCT would not produce significant adverse or significant positive short-term or long-term cumulative effects. Pursuant to the aforementioned, the remaining environmental resources and elements would not be significantly adversely affected or positively affected on a cumulative level because these resources and elements would not be significantly affected under the Proposed Action, and the other listed projects were not identified as significantly impacting these resources. Thus, a significant cumulative effect would not occur from the implementation of the Proposed Action.

5.0 LIST OF PREPARERS

Charles Allen, P.E. – Independent Technical Reviewer, URS - Mr. Allen has a B.S. in Civil Engineering, and is a Professional Engineer with over 35 years experience on a variety of NEPA environmental impact assessments, civil, geotechnical, and seismic engineering projects, Phase I and II Environmental Site Assessments, waste stream and pollution prevention projects, environmental permitting, and hazards analysis. He has served as the Independent Technical Reviewer for several NEPA EAs prepared on behalf of 78 CEG/CEV and for several other Federal agencies including U.S. Department of Veterans Affairs, U.S. Department of Justice, U.S. Army Corps of Engineers, U.S. Postal Service, among others.

Kenneth Branton – Program Manager, URS - Mr. Branton has a B.S. in Mining and Petroleum Engineering. He is a retired Lieutenant Colonel (LtCol) from the U.S. Air Force with 22 years of service as a Bioenvironmental Engineer. LtCol Branton served as the Deputy Director of Environmental Management at Robins AFB and the Chief of the Environmental Restoration Division from 1991-96. He also served as the Deputy Director of the Air Force Environmental Research Laboratory at Tyndall AFB from 1996-98. He completed the Shipley course on "*How to Manage the EIAP/NEPA Process: Air Force Specific (EIAP)"* in 1992 and has conducted environmental impact assessments and served as the Independent Technical Reviewer on numerous Air Force and FEMA projects. Mr. Branton has nine years' experience as a consultant environmental engineer of which seven years has been at Robins AFB as a Senior Program Manager managing all types of environmental projects for the conservation, compliance, remediation, and pollution prevention programs.

Patricia Slade – Project Manager, URS - Ms. Slade has a B.S. in geology and more than 20 years of experience in NEPA documentation, environmental planning, environmental due diligence, and geological studies. She has served as the NEPA Project Manager for previous projects completed for the Air Force, U.S. Army Corps of Engineers, Federal Emergency Management Agency, U.S. Department of Justice, U.S. Department of Veterans Affairs, U.S. Postal Service, among others. She works on a

variety of inter-disciplinary projects, including storm water/NPDES permitting, Phase I ESAs and Phase II investigations, geotechnical investigations, asbestos and lead-based paint surveys, cultural resources surveys, indoor air quality surveys, county-wide flood damage reduction projects, and regulatory compliance projects. She has performed or managed completion of numerous NEPA documents for a variety of federal and state agencies.

Chris Taylor – Environmental Scientist, URS - Mr. Taylor has a B.S. in geology and more than 18 years of relevant experience in environmental due diligence, NEPA documentation, and geological studies. He has prepared several NEPA EAs on behalf of 78 CEG/CEV and worked with other federal authorities for proposed development projects including the Air Force, U.S. Army Corps of Engineers, U.S. Department of Veterans Affairs, Federal Aviation Administration, U.S. Postal Service, among others. He works on a variety of inter-disciplinary projects, including Phase I ESAs and Phase II investigations; geotechnical investigations; asbestos, lead-based paint, lead in drinking water and radon surveys; indoor air quality surveys; and regulatory compliance projects.

6.0 PERSONS CONTACTED

Chip Bridges – 778th CES/CECE

Capt Brent Clark – 78 OSS/OSA

Gary Cox - 78th CEG/CEVP

Stephen A. Hammack, URS Corp (78 CEG/CEV On-site Archaeologist)

Fred Otto – 78th CEG/CEVP

Sam F. Rocker – 78 CEG/CEVP

Bob Sargent – 78th CEG/CEVP

Steve Smith – 78 CEG/CEVP

Ken Wharam – 78th CEG/CEVOS

This page intentionally left blank.

7.0 REFERENCES

Federal Emergency Management Agency (FEMA). 1996. *Flood Insurance Rate Map.* Panel 40 of 275. National Flood Insurance Program.

Federal Emergency Management Agency (FEMA). 1996. *Flood Insurance Rate Map.* Panel 80 of 275. National Flood Insurance Program.

Georgia Soil and Water Conservation Commission. *Manual for Sediment and Erosion Control in Georgia*. 5th Edition.

Middle Georgia Regional Development Center. 2004. *Robins Air Force Base and Middle Georgia 2004 Joint Land Use Study.*

Robins Air Force Base (Robins AFB).

2002. *General Plan.* February 2002.

2004. *Hazardous Waste Management Plan.* May.

2004. Memorandum. *Noise Survey, Air Traffic Control Tower, OSAF, Bldg 37, WPID: 0168-COXX-035A, #04N-035A*. November.

2004. *Draft Integrated Natural Resources Management Plan, Annual Update Supplement.* December.

2006. *Integrated Cultural Resources Management Plan*. March.

2007. *Defense Department Form 1391. Title: Control Tower. April.*

Shaw Environmental, Inc. (Shaw), *Emergency Spill Response Investigation Report, Georgia ANG, Robins AFB, GA,* dated December 2005.

United States Air Force (USAF).

1993. *Air Installation Compatible Use Zone (AICUZ) Study for Robins Air Force Base, Georgia.*

1993. Hazardous noise program. Washington, DC: U.S. Air Force, AFOSH Standard 48-19.

1996. Air Force Handbook 32-1084. *Facility Requirements.*

2003. Air Force Instruction 32–7041. *Water Quality Compliance*.

2006. Memorandum for 78 ABW/CC. *Statement of Intent (SOI) for proposed construction of a new Control Tower at Robins AFB, GA.* June.

AFI 31–101. *The Air Force Physical Security Program.*

AFI 10–245. *The Air Force Antiterrorism Standards.*

United States Department of Agriculture (USDA). 1967. *Soil Survey, Houston and Peach Counties, Georgia.*

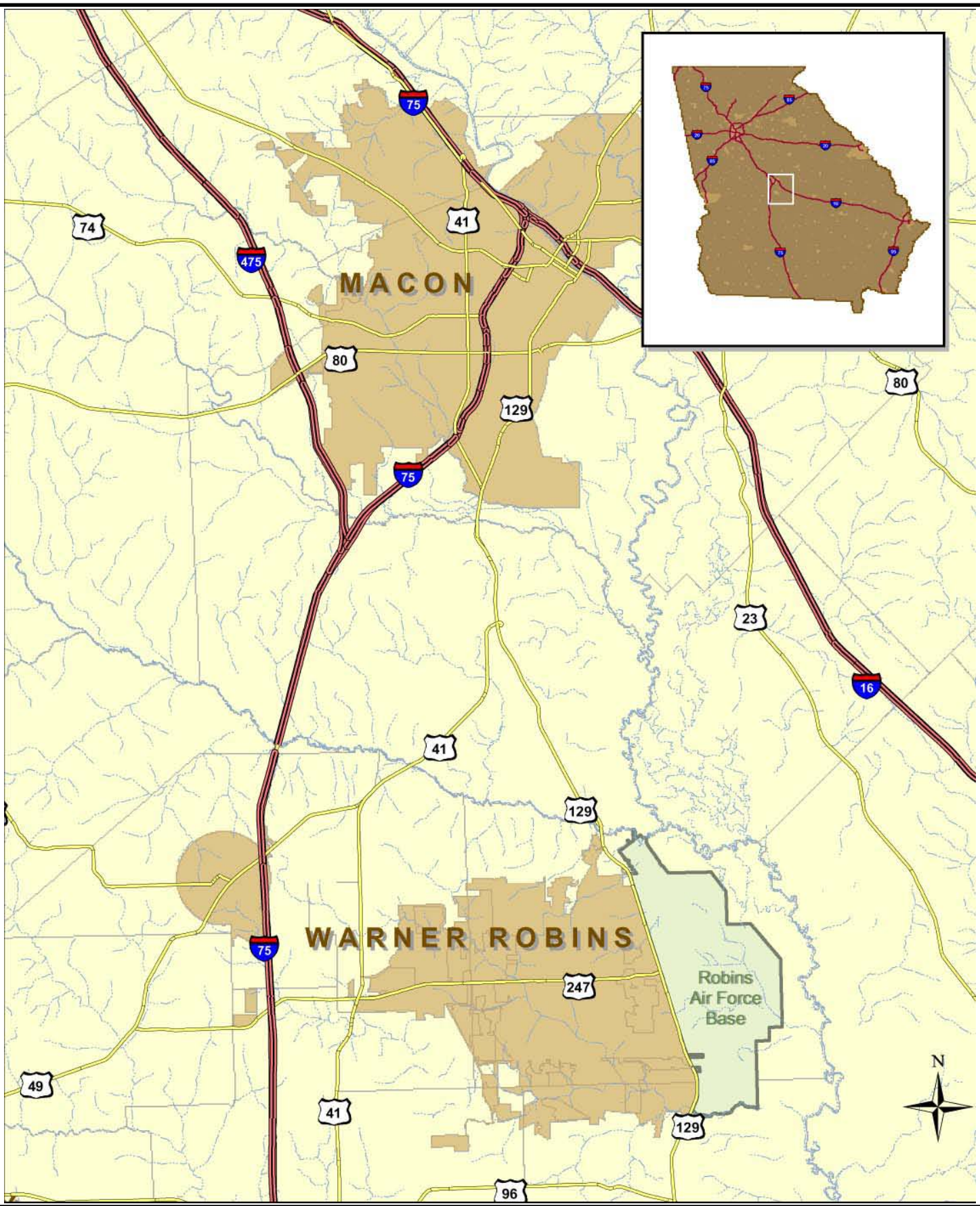
United States Department of Defense (DoD). 2003. *Unified Facilities Criteria, DoD Minimum Antiterrorism Standards for Buildings.* October 8.

Warner Robins Air Logistics Center (WR–ALC).

2006. *Hazardous Waste Reduction Plan, Robins Air Force Base, Georgia*

FIGURES

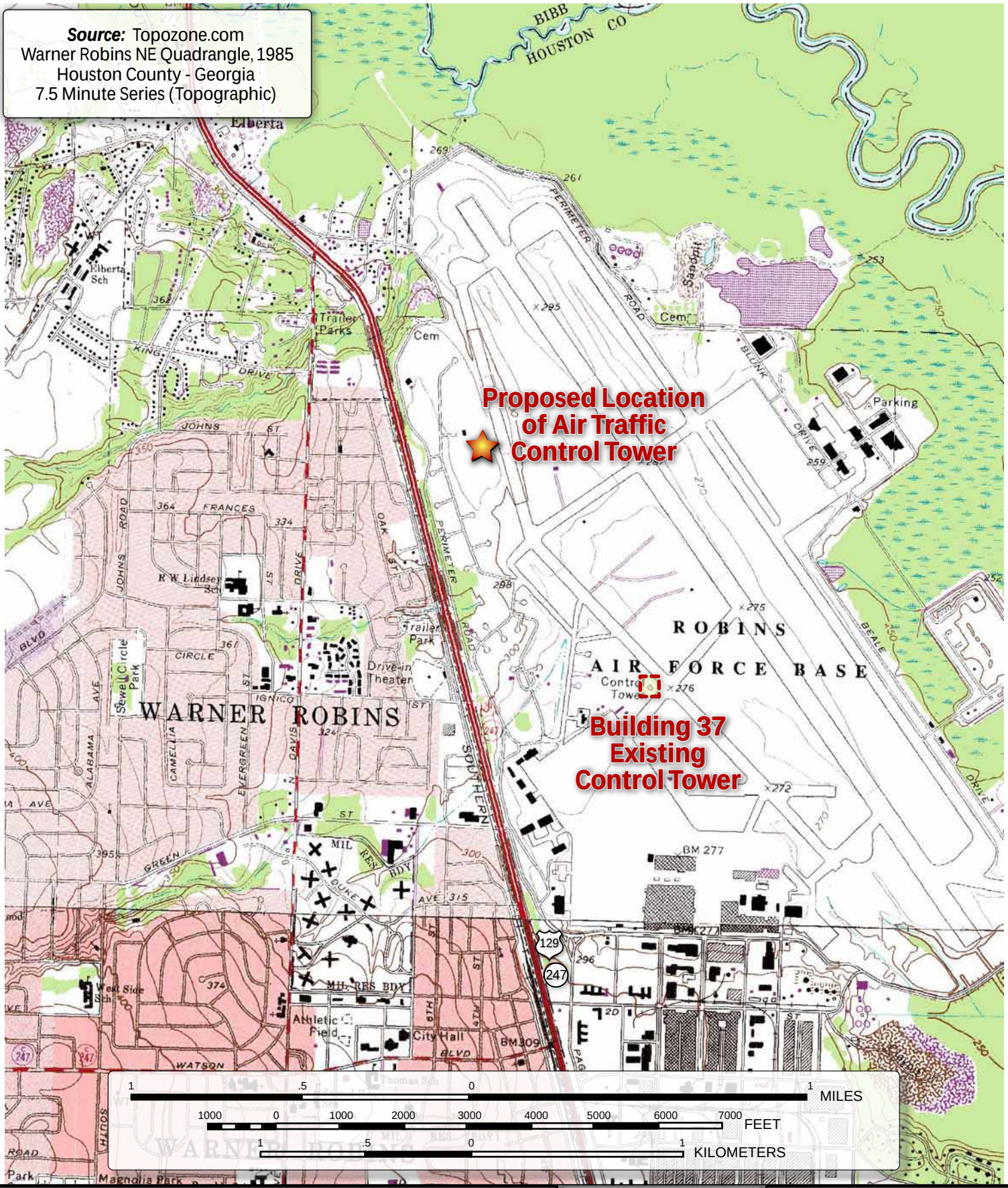
This page intentionally left blank.



CLIENT:	**Robins Air Force Base**		TITLE: **Vicinity Map**
PROJECT:	**Environmental Assessment, Construction & Operation of Air Traffic Control Tower**		
DATE: **July 2007**	DESIGNED BY:		
SCALE: **Unknown**	DRAWN BY: **J. Anderson**		
FILE: **H:\proj\robins\EA\EA ATCT\VicinityMap.ai**	CHECKED BY: **C. Taylor**		PROJ NO.: **15268128.15000** FIG.: **1**

78th Civil Engineer

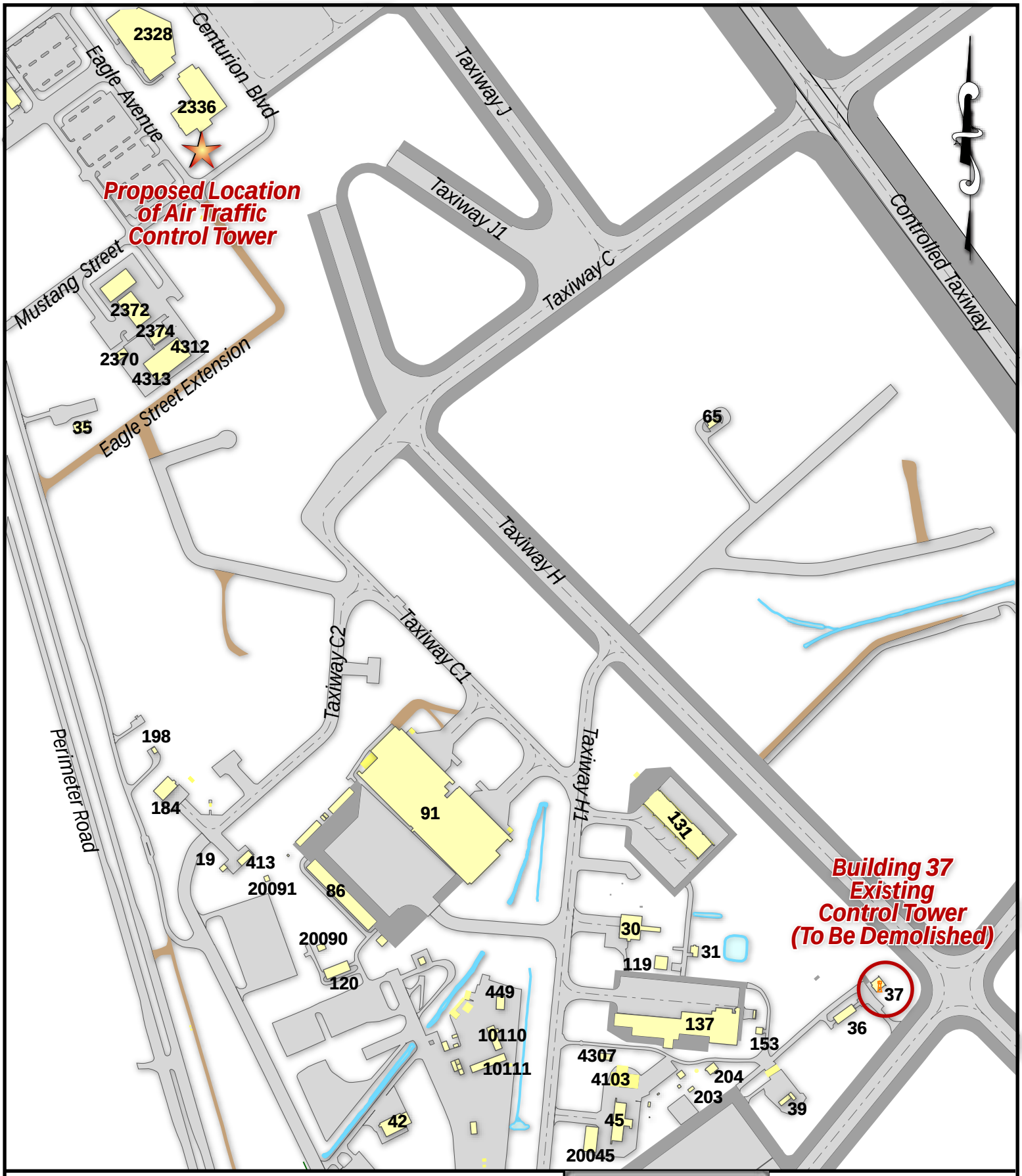
This page intentionally left blank.



CLIENT:	Robins Air Force Base		TITLE: Site Location Map
PROJECT:	Environmental Assessment, Construction & Operation of Air Traffic Control Tower		
DATE: July 2007	DESIGNED BY:		
SCALE: As Shown	DRAWN BY: J. Anderson		
FILE: H:\proj\RAFB\EA\EA ATCT \Sitemap.ai	CHECKED BY: C. Taylor	PROJ NO.: 15268128.15000	FIG.: 2

78th Civil Engineer

This page intentionally left blank.



CLIENT:	Robins Air Force Base		TITLE: Proposed Action Project Area
PROJECT:	Environmental Assessment, Construction & Operation of Air Traffic Control Tower		
DATE:	July 2007	DESIGNED BY:	
SCALE:	Approximately 1"= 500'	DRAWN BY:	J. Anderson
FILE:	H:\Proj\RAFB\EA\EA ATCT\Fig 3 Proj Area.ai	CHECKED BY:	C. Taylor
	78th Civil Engineer	PROJ NO.:	15268128.15000
		FIG.:	3

This page intentionally left blank.

CLIENT:	Robins Air Force Base
PROJECT:	Environmental Assessment, Construction & Operation of Air Traffic Control Tower
DATE:	July 2007
SOURCE:	GoogleEarth.com
SCALE:	Not to Scale
DRAWN BY:	J. Anderson
FILE:	H:\Proj\RAFB\EA\EA ATCT\Figure 4 Aerial.ai
CHKD BY:	C. Taylor

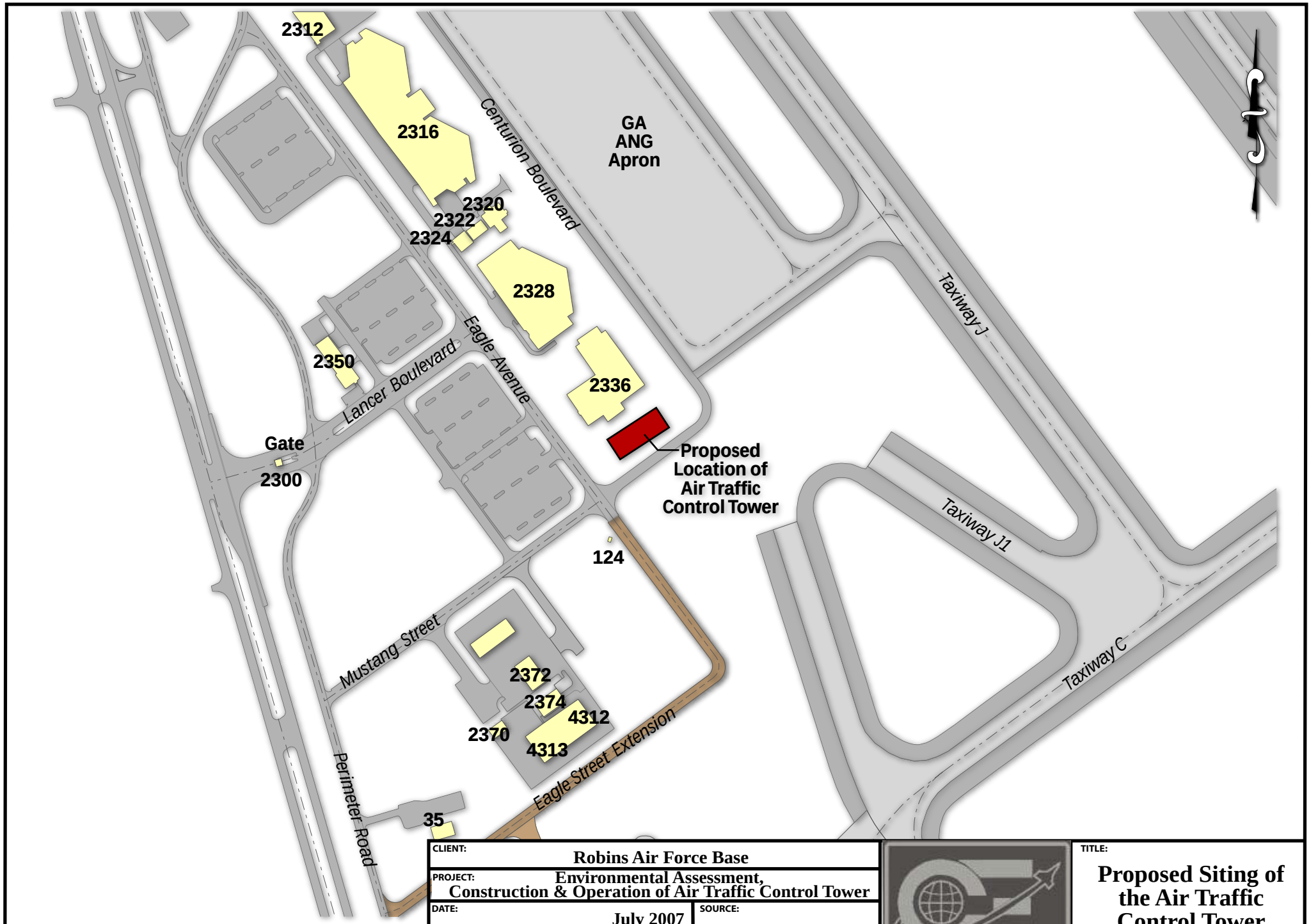
78th Civil Engineer

TITLE: **Aerial Map**

PROJ. NO.: 15268128.15000

FIGURE: 4

This page intentionally left blank.



CLIENT:	Robins Air Force Base
PROJECT:	Environmental Assessment, Construction & Operation of Air Traffic Control Tower
DATE:	July 2007
SOURCE:	
SCALE:	Approximately 1"=350'
DRAWN BY:	J. Anderson
FILE:	H:\Proj\RAFB\EA\EA ATCT\Figure 5 Prop Siting.ai
CHKD BY:	C. Taylor

78th Civil Engineer

TITLE: **Proposed Siting of the Air Traffic Control Tower**

PROJ. NO.: 15268128.15000

FIGURE: 5

This page intentionally left blank.

APPENDIX A

ROBINS AIR FORCE BASE BACKGROUND INFORMATION

This page intentionally left blank.

This appendix presents relevant background information on Robins Air Force Base. Only sections relevant to the subject EA are included.

1.0 INTRODUCTION

This appendix describes the existing environment in the area potentially affected by the alternatives being evaluated. The chapter begins with a description of the location, history, and current missions of Robins AFB. The remainder of the chapter is organized based on descriptions of the components of the environment that may be affected, in the following order: physical environment, air quality, biological environment, cultural resources, land use, noise environment, safety, socioeconomic resources, infrastructure, and waste management. The effects of the alternatives on the baseline conditions of each environmental component are evaluated in Chapter 4, Environmental Consequences.

2.0 BASE DESCRIPTION, HISTORY, AND CURRENT MISSIONS

Not relevant to this EA.

3.0 PHYSICAL ENVIRONMENT

Not relevant to this EA.

4.0 AIR QUALITY

Not relevant to this EA.

5.0 BIOLOGICAL ENVIRONMENT

Not relevant to this EA.

6.0 CULTURAL RESOURCES

Not relevant to this EA.

7.0 LAND USE

Not relevant to this EA.

8.0 NOISE ENVIRONMENT

Not relevant to this EA.

9.0 SAFETY

Not relevant to this EA.

10.0 SOCIOECONOMIC RESOURCES

Not relevant to this EA.

11.0 INFRASTRUCTURE

Not relevant to this EA.

12.0 WASTE MANAGEMENT

12.1 Solid Waste

Not relevant to this EA.

12.2 Hazardous Materials and Waste

12.2.1 Regulations

RCRA

The Resource Conservation and Recovery Act (RCRA) originally was promulgated in 1976 to regulate cradle-to-grave management of hazardous wastes. A hazardous waste, as defined under RCRA, is any waste by-product of society that can pose a substantial or potential hazard to human health or the environment when improperly managed; possesses at least one of four characteristics (toxic, corrosive, ignitable, explosively or chemically reactive), or is listed in Code of Federal Regulations, Part 40, Section 261.3 or applicable state or local waste management regulations. Facilities that have managed (after July 26, 1982), currently manage, or will manage hazardous waste (as specifically defined in the RCRA regulations) in a regulated unit (container, tank, surface impoundment, waste pile, land treatment unit, landfill, incinerator, or miscellaneous unit) are subject to the regulatory requirements of RCRA.

In 1984, RCRA was amended by the Hazardous and Solid Waste Amendments (HSWA). Prior to HSWA, only releases to groundwater of hazardous waste from RCRA-regulated units fell under the corrective action authority of RCRA. HSWA expanded the EPA's authority under RCRA to address corrective actions for both on- and off-site releases of hazardous waste or hazardous constituents to all environmental media from sources throughout the facility. These sources are called solid waste management units (SWMUs). By definition, a SWMU is:

> Any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released (Proposed Rule for Corrective Actions at SWMUs, 55 FR 30801, July 27, 1990).

The terms "solid waste" and "hazardous waste" (a subset of solid waste) are explicitly defined for purposes of the above definition in 40 CFR 261.

CERCLA

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted in 1980 to regulate releases of hazardous substances to the environment at uncontrolled hazardous waste sites. Conceptually, CERCLA is intended for the management of inactive or abandoned waste sites and, as such, complements RCRA, which is generally applied to operating facilities.

The CERCLA response process is defined within the National Contingency Plan (NCP). The application of CERCLA and the NCP to federal facilities is addressed in Section 120 of CERCLA. CERCLA requirements at federal facilities are specific and unique. Section 120 requires the creation of a Federal Agency Hazardous Waste Compliance Docket (Docket) for listing of all federal facilities where there is a potential for release of hazardous substances. Within Section 120, EPA is required by the Superfund Amendments and Reauthorization Act (SARA) of 1986 to ensure that Preliminary Assessments (PAs) are conducted at all federal facilities listed on the Docket within 18 months of their inclusion on the Docket (CERCLA Section 120(d)). Each site is then scored by EPA using the Hazard Ranking System (HRS), which is based on information gathered during the PA/Site Investigation (SI) phase. If a site scores at or above an established threshold level (28.5), the site is placed on the National Priorities List (NPL). Although federal facilities are not eligible for federal funding through the Superfund program, federal facilities that are also subject to the corrective action authorities of RCRA Subtitle C may be listed on the NPL (54 FR 10520, March 13, 1989).

In accordance with CERCLA Section 120(d), not later than six months after the inclusion of a federal facility on the NPL, the facility, in consultation with EPA and the state regulatory agency, shall commence a Remedial Investigation (RI) and Feasibility Study (FS). Within 180 days of EPA's review of the RI/FS results, the federal facility will typically enter into an interagency agreement (Federal Facilities Agreement, or FFA) with EPA for the completion of all necessary remedial actions at the facility. Remedial action should begin within 15 months following completion of the RI/FS.

Hazardous substances are defined under CERCLA as the following:

- any substance designated under the Clean Water Act (CWA) Section 311;
- any element, compound, mixture, solution, or substance under CERCLA Section 102;
- hazardous wastes as defined in the Waste Disposal Act Section 3001;
- any toxic pollutant listed in the CWA Section 307(a);

- any hazardous air pollutant listed in the Clean Air Act (CAA) Section 112;
- any imminently hazardous chemical substance or mixture covered under the Toxic Substances Control Act (TSCA) Section 7; and,
- any substance that may present substantial danger to public health or the welfare of the environment.

Petroleum is excluded from CERCLA unless it contains or is a mixture with a hazardous substance.

Installation Restoration Program

The Defense Environmental Restoration Program (DERP) of the Department of Defense (DoD) is carried out subject to and in a manner consistent with CERCLA Section 120, and in consultation with EPA. In accordance with CERCLA Section 120(a)(4), state laws regarding removal, remedial action, and enforcement apply to removal and remedial action at federal facilities when such facilities are not included on the NPL. State laws that apply to response actions are viewed as ARARs in the CERCLA process.

At all federal facility CERCLA sites, the DoD is the lead agency. The DoD provides a Remedial Project Manager (RPM) whose responsibility is to plan and implement the response action in accordance with the NCP and ARARs (including state laws) and in consultation with the EPA and the state. At non-NPL sites, the DoD may select the final remedy in consultation with the EPA and state. At NPL sites, the federal facility must enter into an interagency agreement, a Federal Facilities Agreement (FFA), with the EPA. The agreement stipulates schedules and terms for remedy selection. The agreement also addresses state, local, and public involvement in the process.

The DERP and the Installation Restoration Program (IRP) provide specific guidance for implementation of the NCP at DoD facilities. SARA addresses the hazardous waste cleanup requirements for federal facilities and establishes the DERP. The IRP of the United States Air Force (USAF) is a component of the DERP.

Robins AFB has implemented a *Hazardous Waste Reduction Plan* (HWRP) (WR–ALC, 2006) that focuses on reducing or eliminating the use of hazardous materials.

12.2.2 Management of Hazardous Materials and Wastes

Reduction of hazardous materials used and hazardous wastes generated is an essential aspect of a successful pollution prevention program. Robins AFB uses many hazardous materials which become components of hazardous waste streams, and the base has programs to reduce the use of hazardous materials and minimize the generation of hazardous wastes. Three categories of

hazardous waste generated at Robins AFB include: process wastes, sludges from wastewater treatment, and excess/expired-shelf-life hazardous materials. Robins AFB is implementing a Hazardous Material Management Plan with the intent of improving the quality of hazardous materials management in each of a material's life cycle phases, from the decision to procure the material through receipt, storage, issue, use and eventual disposition of the material (RAFB, 1996).

Minimization of hazardous waste includes reduction at the source and the use of processes, practices, or products to reduce the generation of hazardous waste, as well as the reuse or recycling of waste so as to reduce its volume or toxicity. Based on the 2006 Robins AFB Hazardous Waste Reduction Plan, WR-ALC is aggressively seeking process improvements that will allow the base to achieve its missions while minimizing the discharge of pollutants to all environmental media. Painting operations, electroplating, avionics, and degreasing operations appear to be achieving their hazardous waste reduction goals. The major areas not meeting goals appear to be abrasive blasting and industrial wastewater treatment sludges. An ongoing, current project to segregate sanitary from industrial sewers and perform upgrades to the IWTPs is projected to reduce hazardous waste sludges from this source. Data describing the hazardous wastes generated at Robins AFB in calendar year 2005 are shown in **Table 12-1**.

The range of activities at Robins AFB require the use of a variety of hazardous materials, including petroleum products (fuels), munitions, pesticides, acids, solvents, paints, and detergents. Programs and activities associated with the management of these materials include:

- The Hazardous Materials/Waste Section has responsibility for the safe storage and handling of all hazardous materials/wastes used or generated on Robins AFB. Wastes are managed according to the *Base Hazardous Waste Management Plan* and RCRA.

Table 12-1. Robins AFB Hazardous Waste Generation – Summary of 2005 Biennial Report.

Hazardous Waste	Amount (tons)
Process waste	838
Sludge from the wastewater treatment plant	350
Excess/expired materials	48
Total	1,235

- The storage of munitions and fuels on base is described in Sections 9.2 and 11.7, respectively.

12.3 Toxic Materials and Waste

12.3.1 Pesticides

Pesticides are regulated under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and are used on the base mainly to control insects that are turf and ornamental plant pests, structural pests, and disease vectors. Pesticides are applied by licensed personnel from the Base Pest Management Shop, and an integrated pest management approach is used to minimize the quantities used. Pesticides are stored in the Pest Management Shop (Building 1549), the Self Help Center (Building 667), and the Golf Course Maintenance Facility (Building 596).

12.3.2 Asbestos Containing Materials

A base-wide asbestos survey for friable asbestos-containing material (ACM) was completed in March 1988. The known friable ACM then was removed in four phases. Friable ACM has now been removed from approximately 98 percent of base facilities. Friable ACM continues to be removed from base facilities through renovation and construction activities. ACM surveying and sampling are included in renovation and construction project activities. Costs for ACM removal also are included in renovation/construction project cost estimates.

12.3.3 Polychlorinated Biphenyls

Robins AFB completed inspection and removal of all transformers and other large capacitors containing polychlorinated biphenyls (PCBs) at concentrations greater than 50 ppm in July 1991, thereby achieving “PCB-free” status. PCB management programs now focus on proper disposal of smaller capacitors, including fluorescent light ballasts that are not regulated under TSCA but pose a risk of liability to the base under CERCLA if they are disposed of as municipal solid waste and contaminate municipal landfills.

12.4 Contaminated Sites

The IRP primarily addresses the cleanup of contamination and damage resulting from past DoD activities. The IRP is primarily intended to clean up past contamination from toxic and hazardous substances; low level radioactive materials; and petroleum, oil, and lubricants (POL). It does not apply to current spill response efforts. Sites suspected of containing at least the reportable quantity (RQ) of a substance may be included in the IRP. Except for recent or current releases, the IRP potentially can address all release sites, including CERCLA sites (whether or not they are listed on the NPL), RCRA SWMUs (subject to certain restrictions), radiological or mixed waste sites, and POL or underground storage tank (UST) releases sites. Although the IRP can and does address a variety of release sites, it is based on the CERCLA process described in the NCP. Elements of the IRP are, therefore, parallel to NCP requirements.

All Air Force properties known or suspected to be contaminated areas of concern (AOCs) due to past activities are evaluated, approved, and authenticated in a systematic manner before being identified as an IRP site. Once a site is discovered, the potential to cause harm to people or the environment is evaluated and appropriate responses are taken. During this assessment, sites are identified and reviewed to determine whether they merit further consideration in the IRP, or whether they merit placement on the NPL. The procedure for systematically evaluating AOCs is outlined in the Draft *No Further Response Action Planned (NFRAP) - A Resource For Making, Documenting, and Evaluating NFRAP Decisions Guide* (August 2, 1994). A decision is then made as to which subsequent step to take (further investigation, removal, monitoring, or site close-out).

For IRP sites on or proposed for the NPL, actions taken are consistent, to the maximum possible extent, with CERCLA and the NCP. These procedures normally are specified in formal interagency agreements (FFAs) between the federal facility, EPA, and the state. It is IRP policy that comparable response procedures under the RCRA corrective action program may be followed if done in a manner that continues to satisfy the essential elements of CERCLA and maintains DoD's lead agency status.

IRP sites not listed on the NPL may be addressed by alternative regulatory processes, including RCRA corrective actions, as stipulated above for NPL sites. RCRA Subtitle I may be followed for the study and clean up of USTs and the Toxic Substance Control Act (TSCA) cleanup procedures may be applicable to polychlorinated biphenyl (PCB) spill sites. For non-NPL sites, decisions such as taking no further action at a site, selecting a cleanup remedy, and implementing long-term monitoring must be documented with a Decision Document (DD). For NPL sites, EPA concurrence is required; for non-NPL sites, it is highly recommended.

In accordance with RCRA, the state issued a Hazardous Waste Facility Permit (GA EPD Permit No. HW-064(S)) to Robins SFB on September 29, 1988. The permit was reissued to Robins AFB on September 21, 1998 and has been updated periodically. A total of 79 SWMUs are currently listed in the Robins AFB Hazardous Waste Permit. The Corrective Action Plan (CAP) has been approved and the final Remedy is in Place (RIP) is in place at all sites. Of the 79 SWMUs, 42 are IRP sites; and of the 42 IRP sites, 31 have received a No Further Action (NFA). Additionally, two AOCs are located on the base.

12.5 References

Robins AFB (RAFB). July 1996. *Pollution Prevention Management Action Plan for Warner Robins Air Logistics Center, Robins AFB, Georgia*. Final Plan. Prepared for Environmental Management Directorate, Robins Air Force Base, Georgia.

WR-ALC. 2006. *Hazardous Waste Reduction Plan, Robins Air Force Base, Georgia.*

APPENDIX B

AGENCY/PUBLIC CORRESPONDENCE

This page intentionally left blank.

PUBLIC NOTICE
FOR THE
DRAFT FINAL ENVIRONMENTAL ASSESSMENT
FOR THE CONSTUCTION AND OPERATION OF AIR TRAFFIC CONTROL TOWER

Robins Air Force Base announces the availability for public review and comment, the Draft Final Environmental Assessment (EA) and proposed unsigned Finding of No Significant Impact (FONSI) for the Construction and Operation of the Air Traffic Control Tower. The proposed action would modernize air traffic control operations and equipment; provide additional space for required air traffic control personnel, equipment and functions; and generally provide a more optimal work environment for air traffic control personnel. This proposed action would include both construction of a new tower and demolition of the old tower. No significant impacts to the environment are anticipated. A copy of the Draft Final EA and proposed unsigned FONSI are available for public viewing and comment for the next 30 days in the Nola Brantley Memorial Library (also known as the Houston County Library), 721 Watson Blvd., Warner Robins, GA, 478-923-0128. For questions or comments, please contact the 78 Air Base Wing Public Affairs Office at FAX 926-9597 or address below: 78 ABW/PA, 215 Page Rd, Suite 106, Robins AFB GA 31098-1662

Houston Home Journal
19 JAN 08

PUBLIC NOTICE
FOR THE
DRAFT FINAL ENVIRONMENTAL ASSESSMENT
FOR THE CONSTUCTION AND OPERATION OF
AIR TRAFFIC CONTROL TOWER

Robins Air Force Base announces the availability for public review and comment, the Draft Final Environmental Assessment (EA) and proposed unsigned Finding of No Significant Impact (FONSI) for the Construction and Operation of the Air Traffic Control Tower. The proposed action would modernize air traffic control operations and equipment; provide additional space for required air traffic control personnel, equipment and functions; and generally provide a more optimal work environment for air traffic control personnel. This proposed action would include both construction of a new tower and demolition of the old tower. No significant impacts to the environment are anticipated. A copy of the Draft Final EA and proposed unsigned FONSI are available for public viewing and comment for the next 30 days in the Nola Brantley Memorial Library (also known as the Houston County Library), 721 Watson Blvd., Warner Robins, GA, 478-923-0128. For questions or comments, please contact the 78 Air Base Wing Public Affairs Office at FAX 926-9597 or address below: 78 ABW/PA, 215 Page Rd, Suite 106, Robins AFB GA 31098-1662

3 col x 4" - $120.00

DEPARTMENT OF THE AIR FORCE
78th Air Base Wing (AFMC)
Robins Air Force Base Georgia

Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, 8th Floor
Atlanta, GA 30334
(404) 656-3855

MAR 11 2008

78 CEG/CEVP
755 Macon Street, Building 1555
Robins AFB, GA 31098-2201

SUBJECT: Draft Final Environmental Assessment (EA), Construction of Air Trafic Control Tower at Robins Air Force Base

1. We request you review the attached document by 12 Apr 08. Please make your comments specific and note them on a separate sheet of paper rather than on the actual document. Negative replies should be in writing to ensure continuity of documentation. If we do not receive your comments by 12 Apr 08, we will assume that the document is accepted as written.

2. Our point of contact is Mr. Mark Hickman, (478) 327-8306.

Fred Hursey

FRED HURSEY
Chief, Environmental Programming Branch
Environmental Management Division

Attachments:
1. Draft Final EA (5 copies)

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Mark Hickman
78 CEG/CEVP
Dept. of the Air Force

FROM: Barbara Jackson

DATE: 3/14/2008

SUBJECT: Executive Order 12372 Review

APPLICANT: Dept. of the Air Force - Robins AFB, GA

PROJECT: Draft Final EA: Construction and Operation of Air Traffic Control Tower (Robins AFB, GA)

CFDA #:

STATE ID: GA080314008

FEDERAL ID:

Correspondence related to the above project was received by the Georgia State Clearinghouse on 3/14/2008. The review has been initiated and every effort is being made to ensure prompt action. The proposal will be reviewed for its consistency with goals, policies, plans, objectives, programs, environmental impact, criteria for Developments of Regional Impact (DRI) or inconsistencies with federal executive orders, acts and/or rules and regulations, and if applicable, with budgetary restraints.

The initial review process should be completed by 4/10/2008 (*approximately*). If the Clearinghouse has not contacted you by that date, please call (404) 656-3855, and we will check into the delay. We appreciate your cooperation on this matter.

In future correspondence regarding this project, please include the State Application Identifier number shown above. If you have any questions regarding this project, please contact us at the above number.

Form SC-1
Nov. 2006

OFFICE OF PLANNING AND BUDGET

Sonny Perdue
Governor

Trey Childress
Director

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Mark Hickman
78 CEG/CEVP
Dept. of the Air Force

FROM: Barbara Jackson
Georgia State Clearinghouse

DATE: 4/9/2008

SUBJECT: Executive Order 12372 Review

PROJECT: Draft Final EA: Construction and Operation of Air Traffic Control Tower (Robins AFB, GA)

STATE ID: GA080314008

The State level review of the above referenced document has been completed. As a result of the environmental review process, the activity this document was prepared for has been found to be consistent with state social, economic, physical goals, policies, plans, and programs with which the State is concerned.

Additional Comments: The applicant/sponsor is advised to note additional comments from DNR's Historic Preservation Division.

/bj
Enc.: Middle Georgia RDC, Mar. 17, 2008
DOT, Mar. 21, 2008
DNR/EPD, Apr. 7, 2008
HPD, Apr. 3, 2008

Form SC-4-EIS-4
January 1995

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: MS. CAROL PAYTON
MIDDLE GEORGIA RDC

SUBJECT: Executive Order 12372 Review

APPLICANT: Dept. of the Air Force - Robins AFB, GA

PROJECT: Draft Final EA: Construction and Operation of Air Traffic Control Tower (Robins AFB, GA)

STATE ID: GA080314008

FEDERAL ID:

DATE: March 17, 2008

☒ This notice is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impact, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.

This notice is not consistent with:

☐ The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ The criteria for developments of regional impact, federal executive orders, acts and/or rules and regulations administered by your agency. Negative environmental impacts or provision for protection of the environment should be pointed out. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ This notice does not impact upon the activities of the organization.

NOTE: Should you decide to FAX this form (and any attached pages), it is <u>not</u> necessary to mail the originals to us. [404-656-7916]

Form SC-3
Sept. 2007

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: GA DOT - AVIATION PROGRAMS, Carol L. Comer, manager
GEORGIA DOT

SUBJECT: Executive Order 12372 Review

APPLICANT: Dept. of the Air Force - Robins AFB, GA

PROJECT: Draft Final EA: Construction and Operation of Air Traffic Control Tower (Robins AFB, GA)

STATE ID: GA080314008

FEDERAL ID:

DATE:

☑ This notice is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impact, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.

This notice is not consistent with:

☐ The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ The criteria for developments of regional impact, federal executive orders, acts and/or rules and regulations administered by your agency. Negative environmental impacts or provision for protection of the environment should be pointed out. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ This notice does not impact upon the activities of the organization.

NOTE: Should you decide to FAX this form (and any attached pages), it is <u>not</u> necessary to mail the originals to us. [404-656-7916]

RECEIVED
MAR 21 2008
GEORGIA
STATE CLEARINGHOUSE

Form SC-3
Sept. 2007

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: DR. CAROL COUCH
DNR/EPD/DIRECTOR'S OFFICE

SUBJECT: Executive Order 12372 Review

APPLICANT: Dept. of the Air Force - Robins AFB, GA

PROJECT: Draft Final EA: Construction and Operation of Air Traffic Control Tower (Robins AFB, GA)

STATE ID: GA080314008

FEDERAL ID:

DATE:

☑ This notice is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impact, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.

This notice is not consistent with:

☐ The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ The criteria for developments of regional impact, federal executive orders, acts and/or rules and regulations administered by your agency. Negative environmental impacts or provision for protection of the environment should be pointed out. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

☐ This notice does not impact upon the activities of the organization.

NOTE: Should you decide to FAX this form (and any attached pages), it is <u>not</u> necessary to mail the originals to us. [404-656-7916]

RECEIVED
APR 07 2008
GEORGIA
STATE CLEARINGHOUSE

Form SC-3
Sept. 2007

Noel Holcomb, Commissioner

Georgia Department of Natural Resources

Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street NW, Suite 1600, Atlanta, Georgia 30303-2316
Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

MEMORANDUM

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: Elizabeth Shirk
Environmental Review Coordinator
Historic Preservation Division

RE: Finding of "No Historic Properties Affected"

PROJECT: EA: Construct Air Traffic Control Tower, Robins AFB
GA-080314-008

COUNTY: Houston County, Georgia

DATE: March 28, 2008

The Historic Preservation Division has reviewed the information received concerning the above-mentioned project. Our comments are offered to assist United States Air Force in complying with the provisions of Sections 106 and 110 of the National Historic Preservation Act of 1966, as amended.

Based on the information submitted, HPD believes that no historic properties or archaeological resources that are listed in or eligible for listing in the National Register of Historic Places (NRHP) will be affected by this undertaking, as defined in 36 CFR Part 800.4(d)(1). Please note that historic and/or archaeological resources may be located within the project's area of potential effect (APE), however, at this time it has been determined that they will not be impacted by the above-referenced project. Furthermore, any changes to this project as proposed will require further review by our office for compliance with the Section 106 process.

If we may be of further assistance contact Jackie Horlbeck, Environmental Review Historian at (404) 651-6777, or Michelle Volkema, Environmental Review Specialist, at (404) 651-6546. Please refer to the project number assigned above in any future correspondence regarding this project.

ES:jph

cc: Kristina Harpst, Middle Georgia RDC
Rebecca McCoy, Robins AFB